

# **GMET CONFLICTS OF INTERESTS POLICY V4.0**

## Approval History

Approved By:	Date of Approval	Version Approved	Comments
Finance, Audit and Resources Committee	3 <sup>rd</sup> October 2022	V1.0	Annual Review
Finance, Audit and Resources Committee	14 <sup>th</sup> September 2023	V2.0	Annual Review
Finance and Resources Committee	7 <sup>th</sup> October 2024	V3.0	Annual Review
Finance and Resources Committee	6 <sup>th</sup> October 2025	V4.0	Annual Review

## Revision History

Revision Date	Previous Revision Date	Summary of Changes	Owner/Editor
14/09/22	03/10/22	Annual Review	Louise Staunton – CFOO
14/09/23	14/09/22	Annual Review	Louise Staunton – CFOO
07/10/24	14/09/23	Annual Review	Louise Staunton – CFOO
06/10/25	07/10/24	Annual Review	Louise Staunton - CFOO

## CONTENTS

1. Legal framework .....	4
2. Definitions .....	4
3. Roles and responsibilities .....	5
4. Identifying conflicts of interest .....	7
5. Identifying conflicts of loyalty .....	8
6. The register of interests .....	8
7. Trust board benefits .....	10
8. Declaring interests .....	10
9. Removing conflicts of interest .....	11
10. Records of proceedings .....	13
11. Non-compliance .....	13
12. Related pay transactions .....	13
13. Monitoring and review .....	16

### Appendices

a) GMET Register of Pecuniary Interest .....	17
b) Declaration of Conflicts of Interest Form for Governors and Trustees .....	22

## 1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- The Companies Act 2006 (strategic Report and Directors' Report) Regulations 2013
- Data Protection Act 2018
- UK General Data Protection Regulation
- Charities Act 2011

This policy has due regard to all relevant guidance including, but not limited to, the following:

- DfE Academy Trust Governance Guide
- The Charity Commission (2014) 'Conflicts of Interest: a guide for charity trustees'
- The Charity Commission (2020) 'Managing conflicts of interest in a charity'
- DfE (2025) 'Academy trust handbook'

This policy operates in conjunction with the following school policies:

- Finance Policy
- Competitive Tendering and Procurement Policy
- Reserves and Investment Policy
- Gifts, Hospitality and Anti-bribery Policy
- Whistleblowing Policy
- Asset Management Policy
- Anti-fraud and Corruption Policy
- Declared Conflicts of Interest Register
- General Interests Register
- Data Protection Policy
- Governing Board Code of Conduct
- Disciplinary Policy and Procedure

## 2. Definitions

For the purpose of this policy, a person is defined as having a '**business or pecuniary interest**' if they have a monetary or financially vested interest in a business or service, which could prevent the individual from acting in the school's best interests.

'**Conflicts of interest**' are any situations where an individual's personal interests or loyalties could, or could be seen to, prevent the individual from making a decision in the best interests of the school. The most common types of conflict of interest can be separated into '**financial conflicts**' and '**loyalty conflicts**'.

**‘Financial conflicts’** are when an individual is connected to a person and/or organisation and could receive money or something else of value from the selection of their decision. Individuals’ expenses, e.g., governor expenses, are not included in this definition.

**‘Loyalty conflicts’** are unrelated to money or individual benefits; rather, these conflicts are concerned with other reasons relating to an individual’s loyalty or duty to another organisation which would impair their decision-making in consideration to their obligation to prioritise the school’s best interest.

A **‘connected person’** broadly relates to an individual’s family, relatives, or business partner. To determine if an individual is considered connected in case-specific issues, we will seek legal advice if necessary.

The term **‘significant shareholder’** refers to any individual or relative of an individual holding more than 20 percent of the share capital or exercising more than 20 percent of the voting power in an organisation.

An **‘interested party’** is defined as a person who has a close relation to a person with a vested interest, e.g., a spouse.

**‘At cost’** refers to the cost of a good or service (not including contracts of employment), without profit.

### **3. Roles and responsibilities**

#### **The Trust board is responsible for:**

- Ensuring that all members of staff, including volunteers, act in accordance with this policy at all times.
- Identifying any conflicts of interest that have not been previously declared.
- Making complete declarations on an annual basis and ensuring they are up to date.
- Ensuring there are measures in place to manage and identify any conflicts of interest.
- Operating and making decisions in the best interests of pupils and the school.
- Independently and objectively making decisions about executive pay and benefits, scrutinising each decision so conflicts of interest are avoided.
- Operating and making decisions in line with their charitable objectives, where applicable.

#### **The chair of Trustees is responsible for:**

- Ensuring, in liaison with the Chief Executive, that all members of the Trust board have declared any conflicts of interest, in accordance with the Declared Conflicts of Interest Register.
- Considering the risks associated with an individual who has declared a conflict of interest participating in any decision-making or voting and seeking advice from the HR and Finance team.
- Setting professional standards of governance and accountability for the board.

**The governance professional is responsible for:**

- Keeping an accurate and up-to-date record of interests for all governors, staff, and volunteers, which is reviewed annually, and can be accessed by relevant people, e.g., Chief Executive, Chief Finance and Operations Officer, Executive Directors
- Keeping accurate meeting minutes.

**The accounting officer with the Chief Finance and Operations Officer is responsible for:**

- Being the trust's lead in financial matters, including a personal responsibility to government and to the DFE's accounting officer.
- Completing and signing a statement on regularity, propriety, and compliance each year and submitting this to the DFE with the audited accounts.
- Ensuring the trust board is compliant with the trust's articles of association, funding agreement, and 'Academy trust handbook.'
- Notifying the DFE's accounting officer immediately, in writing, if the board is not compliant.

**The headteacher is responsible for:**

- Ensuring, in liaison with the chair of governors, that all members of the governing board have declared any conflicts of interest, in accordance with the Declared Conflicts of Interest Register.
- Ensuring that the General Interests Register is published on the school website.
- Ensuring that any staff member who is responsible for proposing a course of action or handling the school's budget has declared any conflicts of interest.
- Deciding who else is considered an 'interested party,' and ensuring they declare any conflicts of interest.

**Staff, including volunteers, are responsible for:**

- Declaring any conflicts of interest.
- Acting in accordance with this policy at all times.
- Identifying any conflicts of interest that have not been previously declared.
- Following the Trust's Whistleblowing Policy where there are concerns that a conflict of interest has not been declared, and an individual might have subsequently benefitted.
- Ensuring that all individuals in a discussion do not have a vested interest in the subject.

#### **4. Identifying conflicts of interest**

All staff (including volunteers) will be able to demonstrate that they do not have a vested interest in any decision-making or budget spending. All staff (including volunteers) will remain objective and act within the best interests of Trust and its pupils.

All Members of the Trust Board and Members of the Local Academy Committees will declare any conflicts of interest at an early stage and inform the relevant people, e.g., the headteacher. Members of the Local Academy Committee will ensure that any conflicts of interest do not prevent them from making a decision that would be in the best interests of the school and its pupils.

Members of the Trust Board and Local Academy Committees and the relevant members of staff will declare the following interests:

- Holding another public office
- Being an employee, director, adviser or partner of another business or organisation
- Pursuing business opportunities
- Being a member of a club, society, or association
- Having a legal or professional obligation to someone else
- Having a beneficial interest in a trust
- Owning or occupying a piece of land
- Owning shares or some other investment or asset
- Having received a gift, hospitality, or other benefit from someone/an organisation
- Owing a debt to someone/an organisation
- Holding or expressing strong political or personal views that may indicate prejudice or predetermination for or against a person or issue.
- Being a governor, associate member, or trustee at any other educational establishment
- Being a spouse, partner, relative or close friend of someone who has one of these interests.

All interests and connections that could influence the Trusts' reputation with the public will be declared.

If staff, including volunteers, have a relative whom they know to have a declarable interest, this information will be declared.

If the trust's members, trustees, or local governors have a relative whom they know to have relevant interests, this will be declared.

Only relevant interests will be declared, e.g., the spouse of the owner of a catering service when the school is seeking a new catering company. Any interests that do not directly benefit individuals or their relatives do not need to be declared – for example, being a small shareholder in a large national company rather than a significant shareholder.

## **5. Identifying conflicts of loyalty**

Conflicts of interest can also arise, even if the individual does not gain any financial benefit when their decision-making as a staff member or a member of the governing board could be influenced by their other interests.

Members of the Trust board and relevant staff will be required to declare any interest that might conflict with their loyalty to:

- Another organisation, such as their employer.
- A member of their family.
- Another connected person or organisation.
- Another governing board or committee of which they are a member.
- The individual that appointed them to the governing board.

Members of the Local Academy Committee will also be required to declare any conflicts of interest where their religious, political, or personal views could interfere with their ability to make decisions in the best interests of the school.

## **6. The register of interests**

Each declaration of interest will be recorded on the Trust's Declared Conflicts of Interest Register.

This register will allow all Trustees/Governors and relevant employees to identify any business, commercial, financial, or personal interests they have.

Details of each interest will be recorded on the register, including the following:

- The nature of the business and/or interest
- The name of the business and/or interest

- The date the interest began.
- A brief description of duties or responsibilities
- The date of cessation of interest
- The date of entry onto the register
- Relevant material interests which occur through close family relationships between those individuals and employees.

The declaration conflicts of interest's register will be stored by the Chief Finance and Operations Officer where they can be accessed by the Chief Executive and Chair of Trustees, as well as inspected by Ofsted or anyone else who has a right to it to carry out their statutory duties.

The DPO will ensure that the registers are protected in accordance with the school's Data Protection Policy.

The Trust board is responsible for deciding who else has access to the registers, including other staff members, governors, and parents.

If an individual has no interest to declare, they will indicate this by stating 'nil' on their conflicts of interest form, before signing and dating the declaration.

If an individual is unsure whether they have a conflict of interest, the Chief Finance and Operations Officer will advise the individual to declare any possible interests until they can confirm their interests at a later date.

Any conflicting interests or relationships will be described in sufficient detail using appropriate language to clarify under what circumstances an individual's position might be brought into question.

If a new interest becomes applicable during the Academic year, it will be the responsibility of the individual concerned to amend the Declared Conflicts of Interest Register.

The declared conflicts of interest's register will be published publicly on the Trust website; this will include but will not be limited to.

- The relevant business and pecuniary interests of members, trustees, governors, and accounting officers will be published publicly on the website.
- The trust will have discretion over the publication of interests of other individuals named on the register.
- Trustees will consider any other interests they deem relevant and, if there is any doubt, register them regardless.

The board of trustees will be responsible for keeping their register of interests up to date through regular review.

## **7. Trust board benefits**

Conflicts of interest can arise where there is a potential or measurable benefit to a member of the Trust board, or to a person connected to a member.

Members of the Trust board can only benefit from the Trust where there is an explicit authority in place in the Trust's governing document.

Trust board benefits include any payments or benefits to members, or a connected person, apart from their reasonable out-of-pocket expenses. Benefits also include situations where a member of the Trust board could receive property, loans, goods, or services from the Trust.

Where there is a proposed sale or lease of land to a member of the Trust board, or to a person or company closely connected with a member, this will require authorisation from the DfE before it is granted, even if the disposal is at full market value.

The payment of reasonable expenses to a member of the Trust board is not a benefit and therefore does not create a conflict of interest or require authorisation.

Equally all of the above applies to Governors and Local Academy Committees.

## **8. Declaring interests**

Wherever possible, the Chief Executive and Chair of Trustees will make arrangements to avoid a conflict of interest arising.

The stipulations below apply to all members of the Trust board, Chief Executive, Local Academy Committees, governors the headteacher and any others in attendance at meetings, including the SLT.

The Trust board will be provided with a standard agenda item at the beginning of each meeting, to declare any actual or potential conflicts of interest. Declarations will be made in writing unless they are made at a meeting where official minutes are being taken.

All members of the Trust Board or Local Academy Committee will be required to declare any interest that has been outlined as an item to be discussed, at the earliest possible opportunity and before any discussion of the item itself.

If a member is unsure whether they are conflicted, they will declare the issue and discuss it with the rest of the Trust Board or Local Academy Committee.

If a member is aware of an undeclared conflict of interest affecting another member, they will be required to notify the rest of the Trust Board or Local Academy Committee for appropriate action.

If the person making the declaration is only one of a number participating in the Trust board's discussion and decision-making process, the declaration will be made to the

other participants. If the person making the declaration is the only person making a decision on behalf of the Trust board, the declaration will be made to the Chief Executive. If the person making the declaration is the Chief Executive, the declaration will be made to the Chair of Trustees. This equally applies to the Local Academy Committee.

Staff will also declare conflicts of interest to the headteacher and ensure that this information is up to date.

If new conflicts of interest arise the relevant senior person will be informed to update the register.

## **9. Removing conflicts of interest**

The Trust board will consider any conflict of interest declared, ensuring that any potential effect on decision-making is eliminated.

If an individual has declared an interest, they will be required to leave the room when the matter is being discussed.

Where there is a conflict of loyalty and the affected member does not stand to gain any benefit, they will be required to declare the interest.

The rest of the Trust board will decide on what level of participation in decision-making, if any, is acceptable on the part of the conflicted member.

- The Trust board will decide whether the affected member:
- Can participate in the decision, after having registered and fully declared their interest.
- Can stay in the meetings where the decision is discussed and made but not participate.
- Must be withdrawn from the decision-making process.

When deciding which course of action to take, the Trust board will:

- Always make their decisions in the best interests of the Trust and its pupils.
- Always protect the Trusts' reputation and be aware of the impression that their actions and decisions may have on others.
- Always be able to demonstrate that they have made decisions in the best interests of the Trust and its pupils, and independently of any competing interest.
- Require the withdrawal of the affected member from any decisions where their other interest is relevant to a high-risk or controversial decision or could significantly affect the member's decision-making.
- Allow a member to participate where the existence of their other interest poses a low risk to decision-making in the school's interest or is likely to have only an insignificant bearing on their approach to an issue.

- Be aware that the presence of a conflicted member can affect trust between other members of the Trust board, could inhibit free discussion, and might influence decision-making in some way.

If the Trust board is discussing the appointment of a post or making decisions that may lead to a staff vacancy, regarding a role for which a Trustee/Governor could apply, the member in question will be required to leave the discussion, as this is classed a conflict of interest.

Members of the Trust board who have declared an interest will not be able to vote or make decisions regarding that topic, including any financial activity connected to the matter, and will not be present when the vote is taken.

The governance professional will record an entry in the minutes when an individual withdraws from a meeting.

Declarations will be clearly recorded so that there can be no potential for misunderstandings.

In circumstances where participation is unavoidable, the chair of Trustees will consider the risks associated with the situation and advice will be sought from the Chief Finance and Operations Officer and HR team. An entry of the situation, including the outcome, will be recorded in the minutes.

The Trust board will follow any legal or governing document requirements on how a conflict of interest must be handled, but may, in serious cases, decide that removing a conflict of interest itself is the most effective way of preventing it from affecting their decision-making.

Serious conflicts of interest include, but are not limited to, those which:

- Are so acute and extensive that the member is unable to make their decision in the best interests of the Trust/school and its pupils.
- Are present in significant high-risk decisions of the trustees.
- Mean that effective decision-making is regularly undermined or cannot be managed in accordance with the required or best practice approach.
- Are associated with an inappropriate governing board benefit.

To remove a conflict of interest, the Trust board will undertake appropriate action, including:

- Not pursuing the course of action.
- Proceeding with the issue in a different way so that a conflict of interest does not arise.
- Securing the resignation of the member affected by a conflict of interest.
- Not making member appointments that would knowingly introduce a conflict of interest.

## **10. Records of proceedings**

Each time a declaration has been made during a meeting or an individual has withdrawn from a discussion, a record will be kept in the meeting minutes.

At a minimum, the following information will be recorded:

- The nature of the conflict
- Which members were affected
- Whether the conflicts of interest were declared in advance
- Whether anyone withdrew from the discussion
- How the trustees reached the decision made
- A description of what was disclosed and in what circumstances.
- A cross-reference to an entry in the Declaration of Interests Register
- The chair of governors or headteacher will sign and date the recording.

## **11. Non-compliance**

Any member of the Trust Board or Local Academy Committees who fails to reveal information to enable the governing board to fulfil its responsibilities might be in breach of the Code of Conduct and, as a result, be bringing the Trust board into disrepute.

Any member of staff found to be withholding information about a conflict of interest may be subject to disciplinary action in line with the Disciplinary Policy and Procedure.

## **12. Related party transactions**

The trust will be even-handed in its relationship with related parties by ensuring:

- Trustees' compliance with their statutory duties to avoid conflicts of interest, not accept benefits from third parties, and declare interest in proposed transactions or arrangements.
- A register of interest has been completed by the governance professional.
- No member of the trust uses their connections to the trust for personal gain.
- All payments are permitted by the articles of association or by authority from the Charity Commission.
- The Charity Commission approves payments to a trustee where there is a significant advantage to the trust.
- Any payment provided to a person satisfies the 'at cost' requirement.

Trusts must report all contracts and other agreements with related parties to DFE in advance of the contract or agreement commencing or being renewed, using DFE's related party on-line form.

Trusts must obtain DFE's prior approval, using DFE's related party on-line form, for contracts and other agreements for the supply of goods or services to the trust by a related party agreed on or after 1 September 2025 where a contract or other agreement exceeds £40,000 in the same financial year ending 31 August

This approval requirement does not apply in the following circumstances:

- contracts and other agreements for the supply of goods or services to a trust by the following educational establishments:
- colleges, universities, and schools which are sponsors of the academy trust
- state funded schools and colleges, including academies.

This concession does not apply to transactions with a subsidiary of such a related party.

- the provision of services to an academy trust with a religious designation, for essential functions fundamental to the academy trust's religious character and ethos which can only be provided by their religious authority.

For the purposes of reporting to and approval by DFE, contracts and agreements with related parties do not include salaries and other payments made by the trust to a person under a contract of employment through the trust's payroll.

When completing the DFE's online form, all the information required to complete the form will be collected – it is not possible to partially complete a form and then return to it.

The following information is needed to create a record for the supplier:

- The name of the supplier
- The supplier's address.
- The supplier's company number which can be found using the [Companies House website](#) (for limited companies)
- The statement which best describes the relationship between the supplier and the trust
- Confirmation that the supplier is listed on the trust's register of interests.
- Confirmation that the trust has a statement of assurance from the supplier.
- Confirmation that the trust has an open-book agreement with the supplier.

The following information is needed about the related party transaction:

- A short description of the goods or services
- Details of the proposed cost
- The start and end date of any contract or agreement

When seeking approval for a related party transaction, evidence including the following is required:

- How the trust agreed to the related party transaction
- That the trust followed its Tendering and Procurement Policy
- That the trust tested the market before making a decision
- How the trust managed any conflicts of interest
- A copy of the agreement and proposed contract

The board of trustees and accounting officer will manage personal relationships with related parties to avoid both real and perceived conflicts of interest, promoting integrity and openness in accordance with the seven principles of public life.

The chair of the board of trustees and the accounting officer will ensure their capacity to control and influence does not conflict with requirements.

The trust recognises that some relationships with related parties may attract greater public scrutiny, such as:

- Transactions with individuals in a position of control and influence, including the chair of the board and the accounting officer.
- Payments to organisations with a profit motive, as opposed to those in the public or voluntary sectors.
- Relationships with external auditors beyond their duty to deliver a statutory audit.

The trust will keep up-to-date records and make sufficient disclosures in their annual accounts to show accordance with the high standards of accountability and transparency required within the public sector.

The trust's register of interests will include business and pecuniary interests, including:

- Directorships, partnerships, and employments with businesses.
- Trusteeships and governorships at other educational institutions and charities.
- For each interest: the name of the business; the nature of the business; the nature of the interest; and the date the interest began.
- Any other interests deemed relevant by the board of trustees.

The register of interests will identify any relevant material interests from close family relationships between the trust's members, trustees, and governors. It will also identify relevant materials arising from close family relationships between those individuals and employees.

Relevant business and pecuniary interests of members, trustees, governors, and the accounting officer will be published on the trust's website.

The governance professional will maintain a Related Party Transactions (RTP) Register, which will be stored in accordance with the Data Protection Policy

### **13. Monitoring and review**

This policy will be reviewed on an **annual** basis, or when new legislation or guidance regarding the subject is published and requires the approval of the Trust board as it cannot be delegated to a committee.

The next scheduled review date will be in **September 2026**.

The Trust Board will carry out continuous monitoring of its and members' activities to ensure that any conflicts of interest are identified and mitigated as soon as possible.

Any staff member or member of Trust board who fails to declare an interest and is found to be in conflict with their decision-making will be required to explain the reasons for their omission to the rest of the governing board.

The Trust board will review the Declared Conflicts of Interest Register on an **annual** basis, or when circumstances have changed.

## **REGISTER OF PECUNIARY INTERESTS**

Academic Year: 2025/26

### **Declaration of Interest**

Governors, Directors and staff have a responsibility to avoid any conflict between their business and personal interests and the interests of the schools and Trust.

- 1 The Trust Board is required to establish and maintain a Register of Pecuniary Interests, which is open to inspection.

Governors, Directors and staff should declare ANY links they have with companies or individuals from which the Trust may wish to buy goods or services; or any member of staff that is related to you in any way. It is important for anyone involved in spending public money to demonstrate that they do not benefit from decisions that they make.

- 2 Governors, Directors and staff must notify the Trust of any financial interest in any contract and must award orders and contracts on merit by fair competition against other tenders and not show special favour to businesses run by friends, partners, or relatives.
- 3 Any person who is present at a meeting of a Governing Body or Trust Board should declare a business interest direct or indirect. This relates to any contract, proposed contract or other matter that is being considered. The person must disclose the fact as soon as is practical at the meeting and take no part in consideration or discussion of the contract or matter concerned. The person must withdraw from the meeting during consideration or discussion unless the Governing Body or Trust Board allows otherwise. In addition, the person cannot vote on any question with respect to the contract or matter.

### **Business Interests**

- 4 There is no comprehensive definition of what constitutes a business interest. In all cases, the natural meaning of the words has to be put in the particular context of the contract or other matter being discussed.

### **Direct Business Interests**

- 5 The following are examples of a direct business interest:
  - any payment of salary, allowances, or other expenses to a member of staff from the school or Trust budgets

- any appointment where a Governor or Director is a candidate.
- a Governor, Director or member of staff runs their own business and has been or could be paid for work done or services received from the school or Trust budget or any other school or Trust funds.
- land owned by a Governor, Director or member of staff where its value might be affected by proposals about the Trust's land or buildings.

### **Indirect Business Interests**

6 A number of matters can be treated as an indirect business interest. Some examples are as follows:

- a Governor, Director or member of staff owns shares in or is a member of a company or another body which has a direct business interest.
- a Governor, Director or member of staff is a business partner of a person or company who has a direct business interest.
- a Governor, Director or member of staff is employed by a person or company which has a direct business interest.
- a Governor, Director or member of staff has a spouse or is living with another person who has an interest in the contract or matter being discussed, including an appointment to the staff of the school or Trust.
- the contract or matter relates to an appointment at the school or Trust which could result in another vacancy for which the Governor, Director or member of staff could be a candidate.

7 Personal relationships can be treated as an indirect business interest. Staff, Directors and Governors must regard themselves as having a personal interest in any matter if that matter directly relates to, or impacts on, their interests or any decisions that they are asked to take that would affect the well-being or financial position of themselves, a relative\* or a friend. Some examples are as follows:

- Appointment – interest in someone's appointment, reappointment, or suspension from office as a Governor, Director, Clerk to the Governing Body or a member of staff.
- Pay and performance – interests in the pay or appraisal of someone working at the school in cases where the Governor, Director or staff member is also paid to work at the school.

*\* Relative means spouse, partner, parent, parent-in-law, son, daughter, stepson, step-daughter, child of a partner, brother, sister, grandparent, grandchild, uncle, aunt, niece, or the spouse or partner of the above.*

### Interests that are not Business

- 8 Some matters are not considered as creating a business interest. Some examples are as follows:
- being a Councillor on a local authority
  - being a rate payer or Council Taxpayer in the area of the school
  - for members of school staff, having an interest that is no greater than the interest of the generality of staff in a matter.
  - having interests that are non-business.
  - having an interest that is so remote or insignificant that it cannot reasonably be regarded as likely to influence a Governor, Director or member of staff.

### Duty to Declare

- 9 Governors, Directors, headteachers and members of staff are bound by Financial Regulations and, therefore, must declare in the Register any business interest they have in a personal capacity in any contract relating to **any** school or the Trust. The declaration must be in writing and be recorded in the Register.
- 10 In addition to any written declaration in the Register, a Governor, Director or any other person attending the meeting of the Governing Body or Trust Board, or one of their committees must declare orally their business interest in any matter and take no further part in discussion or decision on that matter.
- 11 Observance of these rules is the responsibility of the individual Governor, Director, headteacher or member of staff.

## **The Register**

- 12 The Trust Board should arrange for a Register to be kept at the Trust's registered office.
- 13 The Register must be open to public inspection, free of charge during reasonable school office hours.
- 14 The Trust Board should make arrangements for the Register to be kept up to date. This should be done at least annually.

# REGISTER OF PECUNIARY INTERESTS

Academic Year: 2025/26

I (NAME) \_\_\_\_\_

confirm that I have read the guidance and am aware of the requirements of the Financial Regulations as far as they are explained in the Notes of Guidance.

I declare my pecuniary interest as follows:

A. Employment/role at the school or Trust *(please tick all which apply)*

Headteacher

Teaching staff

Support staff

Agency staff

Governor/Clerk

Director

B. Please Tick

I do not have any Pecuniary Interests

I have the Pecuniary Interests listed below:-

Date	Name of company or Individual	Link (e.g., wife / brother)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Appendix B

## Declaration of Relevant Business and Pecuniary Interests Member, Trustee or Governor

<b>Name:</b>	
<b>Trust:</b>	
<b>School:</b>	
<b>Governance role:</b>	

Members, trustees and local governors have a responsibility to avoid any conflict between their business and personal interests and the interests of the trust or school.

Please declare details of:

Directorship, partnership or employment with any business from which the trust or school may buy goods or services.

Trusteeships and governorships at other educational institutions or charities

Relationships with school staff including spouses, partners and relatives

Please also include the above details for any close family member. This might be a spouse, civil partner, child, parent or any other family member who might be expected to influence, or be influenced by, you.

<b>I do not have any relevant interests to declare</b>				
<b>I have the following interests to declare:</b>				
Name of business	Nature of business	Your interest	Date interest began	

I agree to complete a further form if any interest arises after making this declaration.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

## Guidance notes

### *Q. What is a pecuniary interest?*

A pecuniary interest is broadly defined as one where you expect to receive payment, either actual or in kind, or benefits or losses arising from the value of assets. You should declare both pecuniary and non-pecuniary interests. These include:

- **Financial** - interests in a contract or proposed contract by direct or family connection
- **Appointment** - interests in the provision for sponsor governors or interests in someone's appointment, reappointment or suspension from office as a governor, trustee or clerk to the Trust or Local Governing Body
- **Pay and performance** - interests in the pay or appraisal of someone working at the school in cases where the governor, trustee or staff member is also paid to work at the school.

### *Q. Do I need to declare these interests again at the beginning of every meeting?*

No.

You only need to declare at the beginning of a meeting if there is a possible conflict between any of your interests and an item on the agenda. In this case, you must specifically declare that interest. It is not sufficient to have declared it on this form.

### *Q. What will the trust or school do with the information disclosed on this form?*

Your information will be published on the school and / or trust website. There is a statutory obligation on the trust or school to do so.

*If you have any questions about the completion of this form, please ask your clerk.*

*Full details can be found in Schedule 1, Regulation 16 of The School Governance (Roles, Procedures and Allowances) (England) Regulations 2013*