



Policy/Procedure/Guideline Review

Policy/Procedure/Guideline:	Register of Interests Policy
Senior Manager Responsible:	Clerk
Trust Approval:	January 2024
Review date:	2 Years



This document consists of:

- Trust Policy on registering relevant business and pecuniary interests
- Template for registering individual's business interests, for completion for each relevant individual (Appendix 1)

1 Background

1.1 In line with the mandatory guidance in the Academy Trust Handbook, it is the Trust's policy to establish and maintain a register of relevant business and pecuniary interests for all members, trustees, local academy council members, staff with purchasing authority in the Trust and senior staff in each academy (defined for these purposes as the principal and their direct line management reports) 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).

1.2 To avoid repetition within this document, the phrase 'Relevant Individuals' is used to include all members, trustees, local academy council members, staff with purchasing authority in the Trust and senior staff in each academy (defined for these purposes as the Principal and their direct line management reports).

1.3 The register will enable Relevant Individuals to demonstrate that in spending public money they do not benefit personally from the decisions that they make.

1.4 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.

1.5 Relevant business and pecuniary interest include:

- 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

1.6 The register must also identify any material interests arising from close family relationships between the academy trust's members, trustees or members of a local academy council. It must also identify relevant material interests arising from close family relationships between those individuals and employees.

Close family relationships are defined as 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.

1.7 Subject to i and ii below, a trust must pay no more than 'cost' for goods or services provided to it by the following persons ('services' do not include services provided under a contract of employment):



- i. The 'at cost' requirement applies to contracts for goods and services from a connected party on or after 7 November 2013.
 - ii. In relation to organisations supplying legal advice or audit services to the academy trust, the 'at cost' requirement applies where the organisation's partner directly managing the service is a member or trustee of the trust but not in other cases for those organisations. The published ethical standards for auditors also prevent partners or employees of the audit firm from acting as a trustee of their client trust, but not of other trusts.
- any member or trustee of the academy trust
 - any individual or organisation connected to a member or trustee of the academy trust. For these purposes the following persons are connected to a member or trustee:
 - a relative of the member or trustee. 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 member, trustee or a relative of the member or trustee
 - a company in which a member or a relative of a member (taken separately or together), and/or a trustee or the relative of a trustee (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 member or the relative of a member (acting separately or together) and/or a trustee or the relative of a trustee (taken 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.
 - any individual or organisation that is given the right under the trust's articles of association to appoint a member or trustee of the academy trust; or any body related to such individual or organisation
 - any individual or organisation recognised by the Secretary of State as a sponsor of the academy trust; or any body related to such an individual or organisation.
 - A body is related to another individual or organisation if it is controlled by the individual or organisation, or controls the organisation, or is under



common control with the individual or organisation. For these purposes control means:

- holding more than 20% of the share capital (or equivalent interest) or
 - having the equivalent right to control management decisions of the body or
 - having the right to appoint or remove a majority of the board or governing body
- The 'at cost' requirement does not apply to the trust's employees unless they are also one of the parties described in the section relating to connected persons.
 - Whilst these provisions do not apply to contracts of employment, the same principles of securing value for money and using public money properly, including managing conflicts of interest, will still apply. Salaries paid should be appropriate to the individual's skills and experience and to wider market rates.
 - Should any staff/personnel of an individual or organisation referred to in the section relating to connected persons be based in, or work from the premises of, the academy trust, that individual/ organisation and the trust **must** agree an appropriate sum to be paid to the trust for such use/occupation of the premises, save to the extent that they are carrying out work for the trust.

2 Maintaining the Register

- 2.1 The register will be held in the Clerk to the Trust's office who will take lead responsibility for ensuring all Relevant Individuals are identified and the interests registered.
- 2.2 The Trust will publish a list of relevant business and pecuniary interests of Relevant Individuals on its website.
- 2.3 It is the individual's responsibility to notify the Clerk of any relevant changes in their circumstances. Additionally, all individuals will be required to confirm the accuracy of the register entry annually.
- 2.4 The Trust uses Governor Hub and all Relevant Individuals are required to add and confirm their declarations of interest at least annually. In circumstances where adding them to Governor Hub is not possible, appendix 1 should be completed and returned to the Clerk to be added to the Trust's register.



Name	Role
Date of Appointment	Date of Resignation / Retirement

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.

Name of Organisation	Nature of Interest	Date from which involved	Signature	Date of signature	Date interest ceased	Signature	Date of signature	Notes

Notes: 1. Use the notes column to indicate relationships.

