



SPARKEN HILL
ACADEMY

Pecuniary Interests Policy

Adopted: December 2015

Reviewed date: November 2016

Reviewed Nov 2018

Reviewed Nov 2020

Review Date: Nov 2022

Pecuniary Interests Policy of Sparken Hill Academy Trustees and Employees.

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 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.

Trusts **must** publish on their websites relevant business and pecuniary interests of trustees and members.

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 or not 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 to their Principal any financial or non-financial interests which could reasonably be considered to conflict with the Academy's interests. This should be included on the pecuniary interest document for the associated party.

Academies should ensure:

- (a) That employees and governors (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.
- (c) That Pecuniary Interests are updated annually,
- (d) That the Full Governing Body is advised throughout the year at Full Governing Body meetings and included in the minutes that the register is up to date and the name of the person responsible for the register and where they can be located.

On-going 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. This policy will represent the requirements as set out by the Academies Financial Handbook and will be updated to reflect accordingly.

The 'keeper' of the register should ensure that they obtain either a pro-forma declaration which provides the details of the individual declarations to include nil returns.

The Register is accessible for viewing by the following appropriate officers during office hours: Trustees, Principal, External Auditors; and Internal Auditors.

Any request by a member of the public to view the Register of Officers' Interests will be referred to the Principal or Chief Financial Officer. 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.

Date Approved: Nov 2021

Approved By:  Chair of Governors