

# **Register of Business & Pecuniary Interests Policy**

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## 1. Register of Business and Pecuniary Interests Policy Aim

The Board of Directors recognises that relationships with some connected parties give rise to greater public scrutiny and require the highest standards of accountability and transparency in line with the seven principles of public life.

- **Selflessness**  
Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.
- **Integrity**  
Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.
- **Objectivity** – In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.
- **Accountability** – Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
- **Openness** – Holders of public office should be as open as possible about all the decisions and actions they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
- **Honesty** – Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- **Leadership** – Holders of public office should promote and support these principles by leadership and example

## 2. Board of Directors Duty and Conflicts of Interest

The Board of Directors acknowledges its statutory duty in accordance with the Academy Trust Handbook 2021 (Section 2.50) to capture relevant business and pecuniary interests of Members, Directors and its senior and other employees.

Furthermore the Board recognises its duty to publish its register of business and pecuniary interests on the Hatton Academies Trust website and maintain this register on a regular basis.

This policy is written with full regard to the provisions of the Academy Trust Handbook and Charity Commission guidance CC29: Conflicts of Interest: a guide for Charity Trustees. <http://www.charitycommission.gov.uk/detailed-guidance/trustees-staff-and-volunteers/conflicts-of-interest-in-charities/>

Members, and Directors (herein referred to as Trustees) have a legal duty to act only in the best interests of Hatton Academies Trust. They must not put themselves in any position where their duties as trustee may conflict with any personal interest they may have.

The Trust will handle conflicts of interest using the following steps:

1. **IDENTIFY** conflicts of interest

Trustees have an individual personal responsibility to declare conflicts of interest which affect them. The Trust will implement, manage and maintain a robust system to identify conflicts of interest.

2. **PREVENT** the conflict of interest from affecting a decision

Trustees must make decisions only in the best interests of the charity, ensuring that the effect of any conflict of interest on decisions made is eliminated. This may be achieved by:

- a) Not pursuing a course of action
- b) Proceeding with the issue in a different way so that a conflict of interest does not arise
- c) Not appointing a particular trustee or securing a trustee resignation.

Where trustees have decided against removal of the conflict of interest, they must prevent it from affecting their decision in a different way, for example, by:

- d) Following any specific requirements laid out in the Academy Trust Handbook or other statutory guidance or law.
- e) Requiring conflicted trustees to declare their interest at an early stage and withdraw from relevant meetings, discussions, decision making and votes.

3. **RECORD** all conflicts of interest

Trustees must:

- a) Formally record any conflicts of interest and how they were handled, including business and pecuniary interests which could affect create a conflict of interest in the future.
- b) Formally record any Trustee benefits in Hatton Academies Trust's annual accounts.

For illustrative purposes, pecuniary and business interests disclosed must include (this list is not exhaustive):

- 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 Hatton Academies Trust.
- Memberships of any organisations which may work with any Academy within 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.
- Interests of other individuals including (but not limited to) employees of the Trust and close family members of individuals already on the register.

For further information and guidance refer to the Academy Trust Handbook Section 2.50.

### **3. The Trust Register of Business and Pecuniary Interests**

Annually at the commencement of the Academic Year, all Trustees and employees will be asked to complete a form on which to register all business pecuniary interests, as per the form attached at Appendix 1.

The form will be issued by the Assistant to the Trust Executive Team on behalf of the Directors and returns will be chased to ensure a 100% response.

A formal register of all declared interests will be maintained by the Assistant to the Executive Team and made available at meetings as required. The register will be shared regularly with the Board of Directors.

The Chair of the Board of Directors will ensure that every agenda contains an item giving all those present to declare any interests, generally and/or with specific regard to the business on the Agenda.

The Assistant to the Executive Team will ensure that every Member, and Director is issued with a copy of this policy along with a copy of the Charity Commission publication "Conflicts of Interest: a guide for charity trustees".

<http://www.charitycommission.gov.uk/detailed-guidance/trustees-staff-and-volunteers/conflicts-of-interest-in-charities/>



**APPENDIX 1 - Register of Business and Pecuniary Interests Form**

|          |                                    |  |
|----------|------------------------------------|--|
| <b>1</b> | <b>Full Name:</b>                  |  |
| <b>2</b> | <b>Address:</b>                    |  |
| <b>3</b> | <b>Academy &amp; Position Held</b> |  |

**4. Declaration: (delete as appropriate)**

- a) I declare that I and/or the members of my immediate family have no direct and/ or indirect business interests which are required to be declared in accordance with the Trust's Register of Business and Pecuniary Interests policy document which I have read.
- b) I declare that I and/or the members of my immediate family have the following direct and/or indirect business interests which are likely to impinge on my duties as a Director/Staff Member.

**IF THE ANSWER TO 4. IS (b), PLEASE COMPLETE THE FOLLOWING:**

**5. Any Employment, Office, Trade, Profession or Vocation that may result in a conflict of interest**

| <b>Individual and Employer/Body involved:</b> | <b>Description of Employment or Activity which may result in conflict of interest:</b> |
|---|--|
|   |  |
|   |  |

I understand that it is my responsibility to declare the nature of any business interest, direct or indirect, of myself or the members of my immediate family in any contract, proposed contract or other matter when present at a meeting at the Academy where the specified contract/matter comes under consideration and withdraw from the meeting during the discussion and not vote in respect of it.

I also understand that it can be a criminal offence to:

- a) omit information which should be included on this form;
- b) provide information which is false or misleading;
- c) fail to notify the Board of Directors/Principal of any subsequent change in circumstances which might render this declaration to be invalid or out of date.

**Signed** ..... **Date:** .....