HATTON
ACADEMIES TRUST

Register of Business & Pecuniary Interests Policy

Contents

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, Conflicts of Interest and Related Party Transactions

The Board of Directors acknowledges its statutory duty, in accordance with the Academy Trust Handbook 2026 (Section 1.51 to 1.54), to capture relevant business and pecuniary interests of Members, Directors, Local Governors and its senior and other employees.

Furthermore, the Board recognises its duty to publish the register of interests for Members, Trustees and Local Governors on its website in accordance with Academy Trust Handbook requirements and data protection legislation.

Interests declared by employees will not be published but will be used to monitor and manage any conflicts of interest arising.

The Trust will identify, declare and manage related party transactions in accordance with the Academy Trust Handbook and the Trust Finance Manual. Any transaction involving a related party must be disclosed to the Director of Finance and Operations and managed in accordance with Trust financial procedures and DfE requirements.

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), Local Governors and all employees 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 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

- Links to or Trusteeships and governorships with any other organisation including educational institutions and charities, irrespective of whether there is a trading relationship with Hatton Academies Trust

- Your personal relationships with HAT Trustees, Local Governors or members of staff

- Relevant interests of close relatives. Close relatives includes spouse, civil partner, partner, parent, child, sibling, grandparent, grandchild, and any person living in the same household where a financial or business interest may give rise to an actual or perceived conflict.

For each interest, the name of the business, the nature of the business, the nature of the interest and the date the interest began.

For further information and guidance refer to the Academy Trust Handbook Sections 1.51 to 1.54.

3. The Trust Register of Business and Pecuniary Interests

Annually at the commencement of the academic year, all Trustees and Local Governors will be asked to complete a form Appendix 1 on which to register all business pecuniary interests.

All Trust employees will be asked to complete a declaration on the Trust HR system, SAMpeople as to whether they have any interests to declare. Based on this response, any employees that confirm that they have an interest will be asked to complete the form attached at Appendix 1. This will be monitored to ensure that all staff complete the declaration.

A Trust wide 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 and Local Governing Bodies.

The Chair of the Board of Directors will ensure that every agenda contains an item giving all those present the opportunity 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

1	Full Name:	
3	Academy & Position Held:	

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/Local Governor/Staff Member.

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

Directorships, partnerships and employment with businesses

Business Name	Nature of Interest	Date Interest Began

Links to any other organisation or other education institutions and charities (including Trustees and Governorships)

Business Name	Nature of Link	Date Interest Began

Your personal relationships with HAT Board of Directors/Local Governor/members of staff

Name of Trustee/Local Governor/Staff Member	Nature of Relationship	Nature of Interest	Date Interest Began

Relevant Interests of Close Relatives

Name of Relative	Nature of Relationship	Nature of Interest	Date Interest Began

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 confirm that the information provided is complete and accurate to the best of my knowledge and that I will notify the Trust promptly of any changes to these interests.

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