

Pecuniary Interest Policy

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Next Review date:	September 2027			
Review Cycle:	3 Years			
Statutory Policy:	No			
Publication:	Website. G/Policies			
Date	Version	Reason for change	Overview of changes made	Source
05.07.21	0.1	Scheduled Review	Name & Logo update. J Bowman	SCC
15.07.21	0.2	Internal Lead Scheduled Review	No changes. P Lovern	
03.09.21	0.3	Board Lead Scheduled Review	No changes. H Bowman	
17.09.21	1.0	Board Scheduled Review	Ratified	
1.10.24	1.1	Internal Lead Scheduled Review	No changes internal lead	
9.10.24	1.2	Board Lead Scheduled Review	No changes board lead	
18.10.24	2.0	Board Scheduled Review	Ratified	

Code of Conduct for Academy Board Members, Directors & Staff relating to **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 Board 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, Directors and employees, including:

- Directorships, partnerships and employments with businesses of any kind, including those that provide or may 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 Academy;
- For each interest: the name of the business, the nature of the business, the nature of the interest, and the date the interest began.

The Clerk to the Directors will ensure that

- The 'Declaration of Pecuniary, Business and Other Interests' forms are completed by all Members, Directors and Staff.
- The data collected is transferred to the 'Register for the Declaration of Pecuniary, Business and Other Interests' in a timely manner.
- Pecuniary, Business and Other Interests is an Agenda item at all Directors and Members Meetings
- The most current copy of the Register is displayed on the Academy Website
- Any discussions relating to the Pecuniary, Business and Other Interests of Members, Directors and Staff held at Directors meetings are recorded.

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 the Board 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 the Board.

2. Personal Interests

Conflict of interests

Employees must declare in writing to the Board any financial or non-financial interests which could reasonably be considered to conflict with the Academy's interests.

Academies should ensure:

- (a) that employees, Directors and Members (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 by email from their own TSSMAT email address,
- (c) that Pecuniary Interests are updated annually,
- (d) that the Board of Directors is advised annually that the register is up to date and the name of the person responsible for the register and where they can be located.

Ongoing 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. The returns should be kept for seven years.

The 'keeper' of the register should ensure that they obtain either a nil return, or a pro-forma which provides the details of the individual declarations.

The register is available on the TSSMAT website.

Examples of situations where it might be necessary for an officer to declare an interest:

There is a legal requirement for the Academy to maintain a Register of Officers' Interests. In declaring any interests you have, you are protecting yourself from any false accusation of bias or corruption.

*In considering whether you have an interest, you should ask yourself whether a member of public, knowing the facts of the situation, could reasonably think that a relationship or interest you have, might conflict with the interests of the Academy. The list below is not exhaustive and **it is also important to note that you may not always need to declare an interest.** For example, the answer to one of the questions below may be "yes", but the relationship or connection does not impinge on the type of work you do, so you may not need to declare an interest. Conversely, there may be other circumstances not listed below where you do need to declare an interest. If in doubt, please speak to your line manager in the first instance.*

Think about the following questions:

- Are you an Academy Director or Member or related to an Academy Director / Member?
- Are you a partner, company secretary or non-executive chairman of a company which does business with the Academy?
- Are you employed by a body which carries out work for the Academy, or were you recently so employed, or are you related to someone who is so employed?
- Do you do part-time or occasional work for a company which undertakes work for the Academy or which competes with the Academy for work?
- Are you undertaking any business ventures in your own time that could conflict with the Academy's interests?
- Are you related to or friends with anyone who tenders for work from the Academy?