

St Clare Catholic Multi Academy Trust



ST CLARE
Catholic Multi Academy Trust

Declaration of Business and Pecuniary and Non-Pecuniary Interest Policy

Reviewed by St Clare Trust Board; July 2025

Next review by St Clare Trust Board: By 31st July 2026

Purpose and scope

This document set out the principles for managing the declaration of business, pecuniary and non-pecuniary interest of members, directors/trustees, governors and employees of St Clare Catholic Multi Academy Trust (Trust). The Trust takes its responsibility to manage public funds seriously and, therefore, ensures that no member, director/trustee, governor, employee or related party benefits personally from the use of public funds and resources.

It is vital that decision-making processes and the application of decisions by the Trust and its academies are free from personal or other forms of bias, such that the Trust is not laid open to criticism, challenge or reputational damage.

Objectives

In order to ensure that the actions of members, directors/trustees, governors and employees cannot be brought into question, this framework of accountability has been created to ensure that the Trust's business decisions are in no way influenced by personal interests, as well as to provide openness and transparency to all relevant stakeholders and to reflect the Seven Principles of Public Life, which state:

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 that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands it.

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. In taking on your role as a governor, you agree to follow and uphold the Seven Principles.

This policy applies to all of members, directors/trustees, governors and employees of the Trust

Identifying Business and Pecuniary Interests

A business, pecuniary and/or non-pecuniary interest occurs when an individual's ability to exercise judgement or act in the best interests of the Trust could be impaired or otherwise influenced by their involvement in another role or relationship. The individual does not need to exploit his/her position or obtain actual benefit, financial or otherwise, for a conflict of interest to occur. A potential for competing interests and/or a perception of impaired judgement or undue influence can also be viewed as a conflict of interest, resulting in the need to disclose a business, pecuniary and/or non-pecuniary interest.

A conflict of interest exists even where there is the possibility that an individual's personal or wider interests could influence the individual's decision-making and even the perception that there is a conflict can damage the Trust. Conflicts of interest relate to an individual's personal interests and the interests of those connected to them e.g. family member, business partner.

Some guidance on the types of disclosure information members, directors/trustees, governors and employees should consider declaring as a potential disclosable business, pecuniary and/or non-pecuniary interest are set out below:

Directorships and committee appointments

Both paid and unpaid directorships (including non-executive directors or senior employees) of any public or private company or other body, together with any roles or positions with other committees.

Employment and remunerated work

Any paid employment or other sources of income outside their normal work. Examples might be paid consultancy or advisory positions with government departments or private companies.

Gifts, benefits and hospitality

This includes any substantial gift or material advantage received by a member, director/trustee, governor or employee, which in any way relates to his/her role with the Trust. For further guidance on this, please refer to the gifts and hospitality policy.

Shareholdings or other positions

Declaration of the name of any public or private company (including any not-for-profit), business, partnership or consultancy activities within an education setting or certain other sectors where a conflict of interest might arise e.g. Local Authority, in which the member, director/trustee, governor or employee has an interest.

Indirect social/business relationships and family interests

These would include any close association with an individual who has a financial interest, a non-financial professional interest or a non-financial personal interest (and any other interests) of close family members/friends/business partners that might be considered relevant to an individual's position as a member, director/trustee, governor or employee.

Miscellaneous and unremunerated interests

This includes other interests which do not fall clearly within any of the above categories, for example, membership of, or work for, other bodies such as charities, which could possibly influence a member, director/trustee, governor or employee of the Trust.

It is important to note that this list is not exhaustive, and it is impossible to list every potential situation or circumstance that could give rise to a disclosure. Therefore, members, directors/trustees, governors and employees should use their judgement to decide whether any of their interests should be disclosed.

Declaring a conflict of Interest

Each individual has a responsibility to identify and declare all relevant business, pecuniary and non-pecuniary interests. Declarations should be made as they arise, and the Trust will explore potential conflicts of interest as a matter of course as follow:

Members, directors/trustees, governors and employees of the trust will be expected to complete a declaration of business, pecuniary and non-pecuniary interest at the commencement of each academic year. This information will form part of the Trust's Register of Interest and will be made publicly available on the Trust's website.

Key employees will be asked to submit a business, pecuniary and non-pecuniary declaration as standard, even if it is a nil return.

Members, directors/trustees, governors and employees will be asked to declare any interest they have in any agenda item before it is discussed at decision-making meetings (e.g. Board and LGB meetings) and prior to any involvement in procurement processes. Even if an interest has already been declared.

It is the responsibility of each individual to inform the Chair, CEO or CFO/Company Secretary as soon as possible if a conflict arises, or if a conflict might be perceived. Where an actual or potential conflict of interest is likely to occur, the Chair, CEO or CFO/Company Secretary will consider the following approaches and ensure that the reason for the chosen action is documented in minutes and/or records:

- requiring the board member not to attend the meeting and potentially excluding the member from receiving meeting papers relating to their interest

excluding the board member from all or part of the relevant discussion and decision or noting the nature and extent of the potential conflict of interest but judging it is appropriate to allow the board member to remain and participate.

Where an individual changes role or responsibility, any change in their interests must be declared

Wherever an individual's circumstances change in a way that affects the individual's interests (e.g. where an individual takes on a new role outside the Trust or establishes a new business or relationship) a further declaration should be made to reflect the change in circumstances. This could involve a conflict of interest ceasing to exist or a new one materialising and therefore, should be disclosed as soon as possible.

Early identification of business, pecuniary and non-pecuniary interest is key to ensuring that individuals act only in the best interests of the Trust, protecting their own and the Trust's integrity. In declaring an interest, individuals provide the Trust with the opportunity to:

Assess the conflict and associated risks.

Consider whether serious conflicts of interest should be removed or require authority.

Consider whether affected individuals should participate in any decisions where they or a connected party stand to gain, whether directly or indirectly.

Carefully manage any participation by a conflicted individual.

Demonstrate robust management of declaration of interests and conflicts of interest.