



## **Aim**

It is the school's policy that all relevant persons (as defined below) should be reminded from time to time (and no less than annually) of their obligation to make a declaration of any pecuniary or other interest in any proposed transaction to be carried out by the school.

Whenever a relevant person is called upon to make or participate in making or is in a position to influence the making of a decision on expenditure on behalf of the school or any of its pupils, that person should consider whether to make a declaration and subsequently withdraw from further discussion regarding the issue.

The declaration should be made if the person concerned is aware that the recipient of the expenditure is or might be:

1. him/herself
2. his/her employer or employee
3. a business in which he/she has an interest (however remote)
4. a member of his/her extended family
5. a friend
6. someone to whom an obligation (either legal or moral) is owed.

The declaration should preferably be made in writing or recorded in the Minutes of a meeting. It should identify the decision on expenditure to be made and the nature of the connection.

If the person making the declaration is only one of a number participating in the decision, the declaration should be made to the other participants. They should consider, taking into account the amount of the expenditure, the nature of the connection and other relevant circumstances, whether to invite the person to exclude him/ herself from the decision-making process.

If the person making the declaration is the only person making the decision on expenditure, the declaration should be made to the Head Teacher. The Head Teacher should consider, taking into account the amount of expenditure, the nature of the connection and other relevant circumstances, whether it is appropriate for the person concerned to make the decision or whether the decision should be made by someone else.

If the person making the declaration is the Head Teacher, the declaration should be made to the Finance Sub-committee of the Governors, who should thereupon make the decision, excluding the Head Teacher from the discussions.

"Relevant persons" means Governors, the Head Teacher, teaching and non-teaching staff and employees and any other person having power to spend or participate in decisions to spend monies on behalf of the school or any of its pupils.

## **REGISTER OF PECUNIARY INTERESTS**

### **INTRODUCTION**

The Suffolk LMS Scheme requires governors of, or persons employed at a school, to disclose any pecuniary interest, direct or indirect, in any contract entered into or proposed. Clearly, the purpose is to ensure that decisions made in terms of spending the school's money, are in no way influenced by personal interests, and also to help disprove any unfounded claims that this might have happened. By registering an interest, individuals are ensuring that other people involved in decision making know from the outset that there could be a conflict of interests, and for example, could request that the individual concerned takes no part in the process.

The guidance published jointly by OFSTED and the Audit Commission (Keeping Your Balance) states "The governing body should establish a register of pecuniary interests for the governors and staff which should be open to inspection. For example governors and staff should declare any links they have with local firms from which the school may wish to buy goods or services. It is important for anyone involved in spending public money to demonstrate that they do not benefit personally from decisions that they make". Without such a framework of accountability the actions of staff and governors could be open to question.

### **SCHOOL POLICY**

The school has adopted the Suffolk County Council Financial Accountancy Team Guidance Section 2.9: Register of Business Interests which accompanies this policy.

The policy is reviewed annually by the Steering Committee.