

Policy Title: Conflict of Interest Policy	Effective Date:	September 2022
SMT Member Responsible: Julia Finch	Review Date:	September 2025
Governors' Committee Responsible: Finance		

1. Introduction

- 1.1. The Governors of Sheldon School are required to subscribe to a Code of Practice which calls for openness and propriety in all dealings, and to accept the Nolan principles of public life.
- 1.2. In addition, Governors and members of staff in attendance are required to declare any possible conflict of interests at the start of all meetings in which school business is discussed.

2. Interests

2.1. Pecuniary interests that are deemed to be relevant and material are as follows:

- Directorships, including non-executive directorships in Private or Public Companies that seek to do business with the school.
- Ownership or part ownership of private companies, businesses, and consultancies that seek to do business with the school.
- Majority or controlling shareholdings in organisations that seek to do business with the school.
- Any connection with a charity, voluntary or other body contracting or supporting any school activity.
- Trusteeships and governorships at other educational institutions and charities irrespective of whether there is a trading relationship with the school.

2.2. Interests are also deemed to be relevant where they concern the appointment, or promotion, of an employee at the school.

3. Relevance

3.1. Relevance is deemed to exist if the Governor or member of staff:

- Directly has the interest as defined above.
- Has a close relative, such as spouse, or a brother or sister, ancestor or immediate descendant, or a spouse of such a relative who has such an interest.
- Has a partner who has such an interest.

4. Recording of Business Interests & Conflicts of Interest

4.1. The school has established a Register of Business Interests. The Register must list, for every member of the Governing Body and the Headteacher any school-related business interests which they or any member of their immediate family have. In addition, it must be maintained for every member of the Governing Body, Charters Board, the Headteacher and any member of staff involved with the procurement and strategic/financial management procedures of the school, as well as staff who have responsibility for procurement.

- 4.2. Governors on first appointment and annually thereafter, are to complete an entry in the Business Interest Register, which is held in the Finance Office. Any subsequent change in circumstances, which might affect their entry, must also be recorded.
- 4.3. Staff who are affected by the policy are also to record their interests in the register. They are to be reminded of this duty annually, and a notice to this effect is to be included in each edition of the Staff Handbook.
- 4.4. The register is to be available for inspection on request by any Governor, member of staff, or parent, and will be reviewed at least annually by the Finance Committee on behalf of the Governing Body. In addition, Governors will be invited to notify any changes to their business interest declaration at the start of each meeting of the full governing body and at every governors' committee meeting.
- 4.5. At any meeting where a possible conflict of interests becomes apparent, the relevant Governor, or member of staff is to declare their interest. Unless the meeting deems otherwise, the Governor, or member of staff is to take no part in the consideration of the matter, and is to withdraw. They are not to record a vote on the matter under discussion.