



Conflicts of Interest Policy

Incorporating Related Party Transactions Changes April 2019

Date approved by St Nicholas Owen MAC Directors	7 October 2019
Next review date	October 2020
Body responsible for review	Board Compliance Committee

Constituent academy to which this policy relates:

Hagley Catholic High School
Our Lady of Fatima Catholic Primary School
St Ambrose Catholic Primary School
St Joseph's Catholic Primary School
St Mary's Catholic Primary School
St Wulstan's Catholic Primary School
MAC Central Office

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Statement of intent

This policy sets out the framework for ensuring that the decisions and decision-making processes at The Saint Nicholas Owen Catholic Multi Academy Company are, and are seen to be, free from personal bias and do not unfairly favour any individual or company connected with the organisation.

Members, Directors, Academy Representatives and senior officers (Principal, Vice Principal, Assistant Principal, Catholic Senior Executive Leader (CEO), Chief Finance & Operations Officer, MAC Accountant, Business Manager and any others appointed at this level) have an obligation to act in the best interests of St Nicholas Owen Catholic MAC and in accordance with its Articles of Association in order to avoid situations where there may be a potential conflict of interest.

Members, Directors, Academy Representatives and senior officers have an obligation to act at all times in the public interest in the use of the public funds they are entrusted with. This can only be effectively delivered by ensuring that funds are spent in an appropriate, fair, open and transparent way; and where there can be no financial gain, including terms preferential to those offered to an individual or organisation with no connection, either directly or indirectly by a decision maker or anyone/organisation closely connected to them (defined below).

Situations may arise where family interests or loyalties conflict with those of St Nicholas Owen Catholic MAC and/or the Public Interest. They may create problems as they can inhibit free discussions, result in decisions or actions that are not in the interests of St Nicholas Owen Catholic MAC and risk the impression that St Nicholas Owen Catholic MAC has acted improperly.

The Saint Nicholas Owen Catholic Multi Academy Company therefore intends to:

- Ensure that every Director and Academy Representative and senior officer understands what constitutes a conflict of interest and that they have a responsibility to identify and declare any conflicts that might arise.
- Record the conflict and the actions taken to ensure that the conflict does not affect the decision-making of The Saint Nicholas Owen Catholic Multi Academy Company.
- Adhere to the requirements of the Education and Skills Funding Agency (ESFA) regarding the declaration and reporting of all Related Party Transactions (as defined in the Academies Financial Handbook and FRS 102), which may include the obtaining of prior consent in certain circumstances.

This document is to be signed by the Board of Directors (BOD) and each Academy Committee annually.

Signed Chair of the BOD  Date 7th October 2019

Signed Chair of theAcademy Committee

Date

1. Legal framework

1.1. This policy takes its legal framework from the following legislation and statutory guidance:

- a. Companies Act 2006.
- b. Conflicts of Interest: A Guide for Charity Trustees CC29 Charities Commission
- c. Financial Reporting Council FRS 102

1.2. This policy must be read in conjunction with the following other policies:

- a. Directors/ Academy Rep Handbook.
- b. Staff Handbook.
- c. Director/ Academy Rep Code of Conduct.
- d. Articles of Association
- e. Scheme of Delegation
- f. Financial Regulations (Section 18)
- g. Academies Financial Handbook (Revised annually see relevant year)
- h. ESFA guidance issued from time to time

www.gov.uk/publications/related-party-transactions-information-for-academy-trusts

2. Definitions

2.1. Saint Nicholas Owen Catholic Multi Academy Company (St Nicholas Owen Catholic MAC) adopts the definition of the Charity Commission CC29 related to Conflict of Interest and the Financial Reporting Council Standard FRS 102 (section 33) in relation to what constitutes a Related Party. (See Appendix A).

3. Related Parties - ESFA Declaration and/or Authorisation

3.1 There is increasing public concern that some key individuals or people closely related to them; or organisations associated with running academies and trusts have, through weak governance, abused and been allowed to abuse their position of trust and have made financial gain as a result.

3.2 Academies and trusts have always been required to report within their annual accounts related party transactions but the Education and Skills Funding Agency (ESFA) felt that there was a need to bring in tighter controls in order to protect public money and those senior decision makers engaged in the management of public funds within academies and trusts.

3.3 With effect from 1st April 2019 the following controls came into force. St Nicholas Owen Catholic MAC (all trusts) must:

- a. notify the ESFA in advance (via entering the details on a web based portal) of entering into any new related party transaction regardless of its value.
- b. seek the prior approval of the ESFA if the related party transaction exceeds £20,000 as a single transaction, or where a proposed transaction of any value takes the total value within a given financial year for a related party to more than £20,000 in total. **This total is across St Nicholas Owen Catholic MAC not each individual academy within it.**

3.4 St Nicholas Owen Catholic MAC intends to fully adhere to these requirements and to operate at all times in a spirit of openness and transparency.

3.5 **ALL POTENTIAL RELATED PARTY TRANSACTIONS MUST BE FORMALLY REFERRED TO THE CHIEF FINANCE & OPERATIONS OFFICER BEFORE ANY COMMITMENT IS MADE.** He/she will advise based on current regulation/director decision and make the necessary declarations to the ESFA.

4. What Related Party Transactions do the new rules apply to?

4.1 It is impossible to cease trading with anyone or any organisation that has some form of connection with someone who works for or is connected to the governance of St Nicholas Owen Catholic MAC. For example, a teacher whose husband works for a taxi firm or an administrator whose daughter works for an airline. St Nicholas Owen Catholic MAC can't consider using or not using the taxi firm or the airline in the general run of daily business. So there are clearly different tiers that require a proportionate response.

4.2 For the purposes of this policy the related party transactions that section 3 above applies to are referred to as **Tier 1**.

4.3 **Tier 1** are the senior most persons or bodies who have a significant control over or make key decisions about St Nicholas Owen Catholic MAC and where there is a financial transaction or potential financial benefit gain. They are:

- a. The Catholic Church
- b. Member
- c. Director
- d. Academy Representative
- e. Principal
- f. Vice Principal
- g. Assistant Principal
- h. Catholic Senior Executive Leader (CEO)
- i. Chief Finance & Operations Officer
- j. MAC Accountant
- k. Academy Business Manager
- l. Those closely associated with any of the above e.g. Husband/Wife/Daughter etc.
- m. Any Business owned, partly owned or controlled by any of the above (See appendix A)
- n. Any other posts created at the highest levels of decision making.

4.4 Although entering into a financial transaction with Tier 1 (above) is possible under the regulations these are largely governed by a requirement for any supply to be 'At Cost'. This is a complex area and the advice of the Chief Finance and Operations Officer will be given in the process required under 3.5 above.

4.5 **Tier 2** is everyone engaged by St Nicholas Owen Catholic MAC below this level. These transactions are not within the scope of reporting or require permission but must be managed professionally in accordance with Financial Regulation and in an open and transparency way. If there is any potential conflict of interest, then the employee must withdraw from the decision making process (preferred if possible) or have the decision ratified by the relevant Principal prior to any commitment. For example, a trip leader is taking a group overseas and requires a coach to the airport (cost c £150). She asks four companies for a price. One responder is leader's uncle, who manages a local coach firm. He quotes for the trip alongside two other companies and he provides the cheapest quote. The trip leader would take the information to their Principal for a decision. So long as Financial regulations have been complied with and value for money can be defended, they are free to choose the lowest quotation. No reporting is required but clear records need to be preserved for potential later scrutiny by others.

- 4.6 Tier 2 also includes those identified in Tier 1 but where there is only a potential conflict of loyalty and there is no financial transaction or potential financial benefit gain. See 15.3

5. Services offered by the Church (DES)

- 5.1 The Catholic Church is closely associated with St Nicholas Owen Catholic MAC by virtue of legal arrangements and governance structure. St Nicholas Owen Catholic MAC has a single Member (Barberi and Newman Academy Trust) which is controlled by the Church and the Diocesan Bishop has powers over the appointment of Directors. **This effectively means that all financial transactions between St Nicholas Owen Catholic MAC and the Church or potentially any of its offices; and any transactions between St Nicholas Owen Catholic MAC and any Catholic school, academy or trust (MAC) within the Birmingham Diocese is a related party transaction and paragraph 3.5 above must be followed.**
- 5.2 The ESFA and Church have negotiated a special arrangement whereby all **essential services fundamental to religious character and ethos** provided by the Church, such as the Diocesan Education Service annual service charge are deemed to be 'at cost' and as a result there will only need to be reported to the ESFA as a single notification.
- 5.3 **However, any additional services provided may be deemed to be 'traded services' and these may require reporting and prior authorisation if they amount to more than £20,000 within a financial year. The principle of 'at cost' is likely to apply. For anything beyond the annual services charge paragraph 3.5 will apply.**

6. Identifying conflicts of interest

- 6.1. Saint Nicholas Owen Catholic MAC expects individual Directors Academy Representatives and Senior Officers to be able to identify any conflicts of interest at an early stage.
- 6.2. Individual Directors /Academy Representative's or Senior Officers who fail to identify and declare any conflicts of interest will also fail to comply with their personal legal responsibility to avoid conflicts of interest and act only in the best interest of St Nicholas Owen Catholic MAC/Academy and its pupils.
- 6.3. The Board of Directors (BOD) and Academy Committees must ensure that any conflicts of interest do not prevent them from making a decision only in the best interests of St Nicholas Owen Catholic MAC/Academy and its pupils.

7. Articles of Association

- 7.1 The Company's Articles of Association (para 97 P 28) states:

Any Director who has or can have any direct or indirect duty or personal interest (including but not limited to any Personal Financial Interest) which conflicts or may conflict with his duties as a Director shall disclose that fact to the BOD as soon as he/she becomes aware of it. A Director must absent him/herself from any discussions of the BOD in which it is possible that a conflict will arise between his/her duty to act solely in the interests of the Company and any duty or personal interest (including but not limited to any Personal Financial Interest).

8. Scheme of Delegation

8.1. The Company's Scheme of Delegation (Appendix B Para 2.1 P30) states:

Any Academy Representative who has or can have a direct or indirect duty or personal interest (including but not limited to any Personal Financial Interest) which conflicts or may conflict with his duties as a member of the Academy Committee shall disclose that fact to the Academy Committee as soon as he/she becomes aware of it. An Academy Representative must absent himself from any discussions of the Academy Committee in which it is possible that conflict will arise between his/her duty to act solely in the interests of the Academy and any duty or personal interest (including but not limited to any Personal Financial Interest).

9. Officer Duty

9.1 The public is entitled to expect the highest standards of conduct from all employees who work for public sector funded and/or charitable organisations. The Directors of St Nicholas Owen Catholic MAC in turn expect its officers and employees to uphold the highest standards of personal and professional conduct in office. This means conforming to the 7 Principles of Public Life:

- I. Selflessness
- II. Integrity
- III. Objectivity
- IV. Accountability
- V. Openness
- VI. Honesty
- VII. Leadership

9.2 Paragraph 3.10.8 Academies Financial Handbook 2018 requires 'senior employees' to be fully included and conform to requirements.

9.3 All senior officers must adhere to the St Nicholas Owen Catholic MAC Financial Regulations and complete the annual Declaration of Interests.

9.4 Should a Senior Officer at any time feel that they are in a position giving rise to an actual or potential conflict of interest, they must immediately declare this to their line manager or appropriate body (BOD/Academy Committee) and withdraw fully from the process. The principle of 'if in doubt declare' applies.

10. Interests which should be declared

10.1. With express reference to the provisions contained in sections 7, 8 and 9 above (as appropriate), the Director/ Academy Reps/Senior Officer will be expected to declare the following interests where such interests are inconsistent with either the Articles of Association or the Scheme of Delegation (as applicable):

- a. Holding another public office.
- b. Being an owner, employee, director, advisor or partner of another business or organisation.
- c. Pursuing a business opportunity.
- d. Being a member of a club, society or association.
- e. Having a professional or legal obligation to someone else.
- f. Having a beneficial interest in a trust.
- g. Owning or occupying a piece of land.
- h. Owning shares or some other investment or asset.
- i. Having received a gift, hospitality, or other benefit from someone / an organisation.
- j. Owing a financial debt to someone / an organisation.

- k. Holding or expressing strong political or personal views that may indicate prejudice or predetermination for or against a person or issue.
- l. Being a spouse, partner, relative or close personal friend of someone who has one of the above interests.

11. Director/Academy Rep benefits

- 11.1. A Director/Academy Rep can only benefit from St Nicholas Owen Catholic MAC where there is an explicit authority in place in the governing document before any decision conferring Director/ Academy Rep benefit is made.
- 11.2. Director/Academy Rep benefits include any payments or benefits to them directly or via a connected person or organisation, apart from their reasonable out of pocket expenses.
- 11.3. There shall be no sale or lease of a St Nicholas Owen Catholic MAC asset to a Director /Academy Rep or to a person or company closely connected with a Director/Academy Rep. This will in all circumstance will require the prior written authority of ESFA.
- 11.4. The payment of reasonable expenses to Director is not a benefit, so it does not create a conflict of interest or require external authorisation.

12. Register of interests

- 12.1. Director/ Academy Reps/Senior Officers should keep an updated record of any conflicts of interest in the Academy's register of interests, which is maintained by the Clerk to the BOD/ Clerk to the Academy Committee/Chief Finance and Operations Officer respectively. See Appendix C.

13. Declaring interests

- 13.1. Director/ Academy Committee meetings should have a standard agenda item at the beginning of each meeting to declare any actual or potential conflicts of interest.
- 13.2. A Director/ Academy Rep/ Senior Officer should declare any interest which he / she has in an item to be discussed, at the earliest possible opportunity and before any discussion of the item itself.
- 13.3. If a Director/ Academy Rep/ Senior Officer is uncertain whether or not he / she is conflicted, he / she should declare the issue and discuss it with the other Directors/ Academy Reps.
- 13.4. If a Director/ Academy Rep/ Senior Officer is aware of an undeclared conflict of interest affecting another Director/ Academy Rep/Senior Officer, then he / she should notify the other Directors/ Academy Reps or the Chair.

14. Removing conflicts of interest

- 14.1. Director/ Academy Reps/Senior Officers must consider the conflict of interest so that any potential effect on decision-making is eliminated.
- 14.2. Director/ Academy Reps/ Senior Officers must follow any legal or governing document (Articles/Scheme of Delegation) requirements on how a conflict of interest must be handled, but may, in serious cases, decide that removing the conflict of interest itself is the most effective way of preventing it from affecting their decision-making.
- 14.3. Serious conflicts of interest include, but are not limited to, those which:
 - a. Are so acute and extensive that the Director/ Academy Reps/Senior Officers are unable to make their decisions in the best interest of the St Nicholas Owen Catholic MAC and its pupils, or could be seen to be unable to do so.

- b. Are present in significant or high risk decisions of the Director/ Academy Reps/Senior Officers.
- c. Mean that effective decision-making is regularly undermined or cannot be managed in accordance with the required or best practice approach.
- d. Are associated with inappropriate Director/ Academy Rep/Senior Officer benefit.

15. Current Approach

Tier 1

- 15.1. **The Board of Directors has resolved not to enter into any new financial transaction with Tier 1 connections (See 4.3 above and Appendix A) with the exception of those allowed under section 5.**
- 15.2. If there is any proposed exceptional financial transaction at Tier 1 and St Nicholas Owen Catholic MAC, the full Board of Directors must consider and vote on the proposal.
- a. The affected Director/ Academy Rep/Senior Officer must be absent from any part of any meeting where the issue is discussed or decided.
 - b. The affected individual must not vote or be counted in deciding whether the meeting is quorate.

Tier 2

- 15.3. Where there is a conflict of loyalty by anyone in Tier 1 and the individual affected or anyone/organisation closely associated with them, does not stand to gain a financial, the affected individual should still declare the interest.
- 15.4. The remainder of the BOD/Academy Committee must then decide what level of participation, if any, is acceptable on the part of the conflicted Director/ Academy Rep/ Senior Officer. The options might include, but are not limited to, deciding whether the conflicted Director/ Academy Rep/Senior Officer:
- a. Having registered and fully declared the interest, can otherwise participate in the decision.
 - b. Can stay in the meetings where the decision is discussed and made, but not participate.
 - c. Should withdraw from the decision-making process in the way described above.
- 15.5. In deciding which course of action to take regarding a conflict of interest, the BOD/ Academy Committee:
- a. Must always make their decisions only in the best interest of St Nicholas Owen Catholic MAC.
 - b. Should always protect St Nicholas Owen Catholic MAC's reputation and be aware of the impression that their actions and decisions may have on those outside the organisation.
 - c. Should always be able to demonstrate that they have made decisions in the best interests of St Nicholas Owen Catholic MAC and its pupils, and independently of any competing interest.
 - d. Should require the withdrawal of the affected Director/ Academy Rep /Senior Officer from any decisions where the Director/ Academy Rep's other interest is relevant to a high risk or controversial Director/ Academy Rep decision or could, or be seen to, significantly affect the Director/ Academy Rep's decision-making at St Nicholas Owen Catholic MAC.

- e. Can allow a Director/ Academy Rep/Senior Officer to participate where the existence of his / her other interest poses a low risk to decision-making in St Nicholas Owen Catholic MAC's interest, or is likely to have only an insignificant bearing on his / her approach to an issue.
- f. Should be aware that the presence of a conflicted Director/ Academy Rep/Senior Officer can affect trust between Directors/ Academy Reps/Senior Officers, could inhibit free discussion, and might influence decision-making in some way.

15.6. Director/ Academy Reps can, before their discussion, ask a Director/ Academy Rep/Senior Officer who is withdrawing, to provide any information necessary to help make the decision in the best interests of St Nicholas Owen Catholic MAC and its pupils.

15.7. All employees not specified as a Senior Leader in paragraph 4.3 are Tier 2 and must adhere to paragraph 4.5 above.

16. Records of proceedings

16.1. BOD/ Academy Committee should record in the minutes, details of any and all discussions on potential conflicts of interests and the decisions made.

17. Confidentiality

17.1. **Director/ Academy Reps cannot use information obtained at St Nicholas Owen Catholic MAC for their own benefit or that of another organisation if it has been obtained in confidence or has special value such as commercial sensitivity.**

18. Monitoring and enforcement

18.1. The Board of Directors of Saint Nicholas Owen Catholic Multi Academy Company Academy will carry out continuous monitoring of its activities and members to ensure that any conflicts of interest are identified and mitigated as soon as possible.

18.2. Director/ Academy Reps/Senior Officers who fail to declare an interest and are found to be in conflict with the best interests of St Nicholas Owen Catholic MAC will be expected to explain to the BOD his / her reasons for their failing. In the case of Officers, such measures may consist of disciplinary action which may include dismissal in cases of gross professional misconduct.

18.3. The BOD may refer the transgression to the Member who may decide to terminate the office of the relevant Director/ Academy Rep from the BOD/ Academy Committee, if he/she is found to have knowingly and deliberately failed to declare an interest and has brought St Nicholas Owen Catholic MAC into disrepute.

19. Policy circulation

19.1. This policy will be circulated to every Director/ Academy Rep/Senior Officer who shall sign a statement (Appendix B) which affirms that he / she has:

- Received a copy of the policy.
- Has read and understood the policy.
- Has agreed to comply with the policy.

19.2. This policy will be included in the publication scheme on the St Nicholas Owen Catholic MAC website and will be made available to the public.

Appendix A

Conflict of Interest – CC29 Charities Commission

2. Trustees have a legal duty to act only in the best interests of their charity. They must not put themselves in any position where their duties as trustee may conflict with any personal interest they may have.

3.1 What is a conflict of interest? (a legal requirement)

A conflict of interest is any situation in which a trustee's personal interests or loyalties could, or could be seen to, prevent the trustee from making a decision only in the best interests of the charity.

Key points about identifying conflicts of interest:

A conflict of interest exists even where there is the possibility that a trustee's personal or wider interests could influence the trustee's decision making.

Even the perception that there is a conflict of interest can damage the charity. Where the perception is not accurate because there is no conflict of interest, the trustees should always be able to respond appropriately to the situation by managing the risks to the charity and being prepared to explain how they have made their decisions only in the best interests of the charity.

The Commission's guidance *It's your decision: charity trustees and decision making (CC27)* explains the principles that trustees should apply when making decisions affecting their charity.

Conflicts of interest relate to a trustee's personal interests and the interests of those connected to them. This means that there is a conflict of interest where there is a proposed transaction between the charity and a connected person. Similarly, there is a conflict of interest where there is a benefit or a potential benefit to a connected person.

Related Party Defined Financial Reporting Council FRS 102 - Section 33

33.2 A related party is a person or entity that is related to the entity that is preparing its financial statements (the reporting entity).

(a) A person or a close member of that person's family is related to a reporting entity if that person:

- (i) has control or joint control over the reporting entity;
- (ii) has significant influence over the reporting entity; or
- (iii) is a member of the key management personnel of the reporting entity or of a parent of the reporting entity.

(b) An entity is related to a reporting entity if any of the following conditions apply:

- (i) the entity and the reporting entity are members of the same group (which means that each parent, subsidiary and fellow subsidiary is related to the others).
- (ii) one entity is an associate or joint venture of the other entity (or an associate or joint venture of a member of a group of which the other entity is a member).
- (iii) both entities are joint ventures of the same third party.

- (iv) one entity is a joint venture of a third entity and the other entity is an associate of the third entity.
- (v) the entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity. If the reporting entity is itself such a plan, the sponsoring employers are also related to the reporting entity.
- (vi) the entity is controlled or jointly controlled by a person identified in (a).
- (vii) a person identified in (a)(i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).
- (viii) the entity, or any member of a group of which it is a part, provides key management personnel services to the reporting entity or to the parent of the reporting entity.

33.3 In considering each possible related party relationship, an entity shall assess the substance of the relationship and not merely the legal form.

33.4 In the context of this FRS, the following are not related parties:

- (a) Two entities simply because they have a director or other member of key management personnel in common or because a member of key management personnel of one entity has significant influence over the other entity.
- (b) Two venturers simply because they share joint control over a joint venture.
- (c) Any of the following simply by virtue of their normal dealings with an entity (even though they may affect the freedom of action of an entity or participate in its decision-making process):
 - i) providers of finance;
 - (ii) trade unions;
 - (iii) public utilities; and
 - (iv) government departments and agencies.
- (d) A customer, supplier, franchisor, distributor or general agent with whom an entity transacts a significant volume of business, merely by virtue of the resulting economic dependence.

33.4A In the definition of a related party, an associate includes subsidiaries of the associate and a joint venture includes subsidiaries of the joint venture. Therefore, for example, an associate's subsidiary and the investor that has significant influence over the associate are related to each other

Appendix B

Annual Conflicts of Interest Acknowledgement Statement

In accordance with section 16.1 of the Conflicts of Interest Policy (“the Policy”), I, the undersigned Director/ Academy Rep and / or committee member with powers delegated by the BOD of The Saint Nicholas Owen Catholic Multi Academy Company hereby attests and affirms that I have:

1. Received a copy of the Policy.
2. Read and understood the Policy.
3. Agreed to comply with the Policy.

Print name

Signature

Dated ____ / ____ / ____

Appendix C

The Saint Nicholas Owen Catholic Multi-Academy Company - Register of Interests

Name.....Director/Academy Rep/Staff

I wish to declare the following interests which will form part of the publically visible register (please tick and complete as appropriate):

1. I am an employee of the organisation/s set out below <input type="checkbox"/> I am not employed by any business or organisation <input type="checkbox"/>			
Name of Business	Nature of Business	Nature of Interest	Date Interest Began
			(if pre Oct 2014 state 'Pre Oct 14' if post Oct 14 state actual)
2. I own, part own or hold a significant interest (20% or above of voting rights or shares) in the business/es or organisation/s listed below <input type="checkbox"/> I have no such interests to declare <input type="checkbox"/>			
Name of Business	Nature of Business	Nature of Interest	Date Interest Began
3. I or the business declared in 2 above receive sponsorship from those listed below <input type="checkbox"/> I have no sponsorship to declare <input type="checkbox"/>			
Name of Business	Nature of Business	Nature of Interest	Date Interest Began

4. I or the business declared in 2 above:

Owns or holds a licence to occupy land listed below which is in the area of an academy within SNOMAC

I have no such interests to declare

Address	Academy area	Nature of Interest	Date Interest Began

I am related to or have a close personal relationship (civil partner, living in the same household) with the following staff/member/director/academy representative.

I have no such interests to declare

Name	Nature of Relationship		Date Relationship began

6. I hold another Public Office (inc. member, trustee, governor at other educational institution or charity) and list these blow

I have no such interests to declare

Name of Office	Nature of Office	Nature of Interest	Date Interest Began

The following information is required for the purposes of good governance and will be used internally. The information disclosed will not form part of the publically visible register but may be disclosed to the EFA and the company's auditors as part of any assurance process.

You are in a position of influence within SNOMAC, which is funded mainly from the public purse, and the public must be assured that the letting of all contracts and the spending of all funds is administered fairly, openly and with regard to value for money at all times.

In this section you are asked to disclose any **material interests** of those with whom you have a close personal relationship (a relative, in a personal relationship with or living in the same household) and where, if made public, the public may feel that a decision on spending or in the awarding of a contract may have been unfairly influenced by that relationship.

For example if your son works at KFC at the weekends serving customers, this is not a material interest. An academy may buy from KFC at odd times but your son does not gain anything as a result. If, however, your son is a salesman for a computer company that may bid for a contract to supply computers or may sell computers to an academy within SNOMAC then this interest is material.

ConsiderWho do I have a 'close personal relationship' with (defined above)? Which organisation do they work for, own or hold a significant interest in? Is there any possibility that organisation will have a business relationship with any SNOMAC academy? If the answer to the latter is 'YES' please give details below.

7. Any of the above interests which apply to a close relative, spouse, civil partner or household member			
Organisation	Name/ Relationship	Nature of Interest	Date Interest Began

I declare that the information I have given in this form is to the best of my knowledge and understanding, truthful and complete.

I declare that I will inform St Nicholas Owen MAC at the earliest opportunity to do so, of any changes, additions and amendments to the above information.

Signature Date