



Register of Business and Financial Interests Policy

ODBST Level 1 Statutory Policy:	ALL Schools require this policy with no changes allowed to core text. No changes are necessary to personalise this with school name and branding, as this is a Trust level policy for use, without change, by all schools. LGBs will note adoption in LGB meetings. Review will take place at Trust level, and schools will be notified of updates and review dates as necessary.
Other related ODBST policies and procedures:	ODBST Finance Manual
Committee responsible:	FRAPP
Approved by:	FRAPP
Date Approved:	24 th September 2024
Date for Next Review:	24 th September 2028

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged.

Purpose and Scope

The Governing Body and members of staff who can influence buying decisions recognise their responsibility to avoid any conflict between their business and personal interests and those of the academies.

The Clerk to the LGB must therefore maintain a register of the business interests of each governor, member of staff with significant financial responsibilities, their relatives and other individuals who may exert influence. The register includes:

- interests with suppliers from which the academy may wish to buy goods or services;
- interests in the appointment, salary, promotion or conditions of service of members of staff.

The information in the register is taken into account whenever buying or staffing decisions are made. Any governor or member of staff who has an interest in a business tendering for a contract does not form part of the committee awarding the contract. Any governor or member of staff who has an interest in the appointment, salary, promotion or conditions of service of a member of staff does not form part of the committee recommending or deciding these.

Governors and members of staff will be required to inform the clerk of any changes in their interests as these arise so that they can be entered in the register. The register will also be updated annually. Nil returns are obtained as appropriate. Any governor or member of staff who is unwilling to declare their interests or complete a nil return is not permitted to influence a buying or staffing decision.

The minutes of the Local Governing Body or any other committee which can influence a buying decision will record a standard agenda point seeking updates to governors' business interests.

The only exception to the requirement to disclose a business interest is that if the interest is so distant or small that no ordinary right-thinking person would expect it to influence a person who might have dealings with the firm concerned. In such cases, it need not be disclosed. An example is a modest shareholding in a large public company even if the academy has or may have dealings with the company.

The register is freely available for inspection by governors, staff and parents via the academy web site

The ODBST form follows.

Appendix 1: Declaration of Interests Form 2024-25- *please insert your name here*

Our Trust is committed to acting with integrity and impartiality. To this end, we must keep a register of the relevant business and financial interests of **Members, Trustees, local governors and senior employees**.

We're also required to publish these interests with respect to Members, Trustees, local governors and the Accounting Officer.

These interests are anything that might sway your decision making or affect your ability to act in an impartial way. For example, if you:

- Are a Trustee or governor at another school or charity
- Work for a company that the school might engage the services of (e.g. a catering or payroll provider, etc.)
- Have a personal relationship with any Members, Trustees, local governors or employees of the Trust (e.g. spouse, partner, relative, etc.)
- Is connected to anyone who supplies goods and/or services to the school

If you're not sure an interest counts, err on the side of caution and declare it.

The following notes may help:

CONFLICTS OF INTEREST, ODBST Articles of Association Clauses 97-98 Members/Directors /Trustees/Senior Central Staff

97. 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 Directors as soon as he becomes aware of it. A Director must absent himself from any discussions of the Directors in which it is possible that a conflict will arise between his 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).

98. For the purpose of Article 97, a Director has a Personal Financial Interest in the employment or remuneration of, or the provision of any other benefit to, that Director as permitted by and as defined by Articles 6.5 - 6.9 (*to paraphrase: the CEO, and occasionally, by strict definition, a Director also providing a service to the MAT*).

Charity Commission Guidance on Connected Persons

If someone is connected to a trustee, they are known as a 'connected person'. For example:

- a spouse or partner
- siblings
- a brother- or sister-in-law
- parents
- business partner

If a connected person is to be paid or employed by the charity, the Trustee(s) they are connected to must not be involved in any part of the process.

ODBST needs the Charity Commission's permission to pay or employ someone who is connected to a Trustee.

<https://www.gov.uk/guidance/payments-to-charity-trustees-what-the-rules-are>

We ask that you update us whenever your circumstances change so we can ensure our register of interests is accurate.

Please fill in and return the form below.

Category	Details of the interest declared If you have nothing to declare, please indicate nil return in the box below	Date interest began	Date interest ceased in the last 12 months (if applicable)
<p>Current employment and any previous employment in which you continue to have a financial interest.</p> <p>Please also include companies in which you hold more than 1% of the share capital.</p>			
<p>Any governance roles held in other educational establishments e.g. governor at another school, MAT or FE College</p>			
<p>Non- educational appointments (voluntary or otherwise), e.g. trusteeships, directorships, local authority memberships, magistracy, tribunals etc.</p>			
<p>Membership of any professional bodies, special interest groups or mutual support organisations. e.g. trade union membership</p>			
<p>Any contractual relationship with ODBST or any company or other organisation connected with the Trust. e.g. with the</p>			

local authority or ESFA			
<p>Please indicate any personal relationships (including spouse/ partner/ close relatives) with any Trustee, Local Governor, Member or employee of the Trust.</p> <p>Please also indicate any relevant business or financial interests arising from goods and/or services offered by connected persons (see definition above) to the school/ trust.</p>			

To the best of my knowledge, the above information is complete and correct. I have set out below my interests in accordance with Clauses 6.39(b) and 97-98 the Articles of Association on Conflicts of Interest, compliance with the Academy Trust Handbook and guidance on Connected Persons as defined by the Charities Act. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Signed:

Date:

Position:

Appendix 2: suggested website template for local governance

Welcome to X school Local Governing Body

ODBST Trust Board

We are members of the Oxford Diocesan Bucks Schools Trust and the governance of the Trust belongs to the main ODBST Board of Trustees. Our Scheme of Delegation can be accessed here [ODBST scheme of delegation](#)

This also includes our Constitution and Terms of Reference. Paper copies can be obtained through the school office or by using the contact us option on this website. You can also find details of the Trust Board and details of our Trust Governance by clicking the link to the ODBST website [ODBST Governance](#)

The Clerk to the Local Governing Body is XXXX XXXX and can be contacted by email: *(provide email)*

Our Local Governing Body Governors (LGB) 2024-25 are as follows:

Register of Interests

Name (full name and title)	Role	Date of Appointment	Term of office	Date stepped down	Appointed by	Nature of relevant business or financial interest, including governance roles in other educational establishments and connected persons	Date interest began	Date interest ceased (if applicable)
Mrs A Test	Skills Governor	01/09/2023	4 years	N/A	Trustees	Nil return		
Mr B Test	Foundation Governor and Chair of Governors	30/04/2022	4 years	N/A	ODBE	Daughter is a class teacher at X Primary school within the ODBST. Son is Headteacher at X Primary School, Oxford	01/04/2021	01/07/2024
Governors who left during the last 12 months								
Mr C Smith	Foundation Governor	22/03/2023	4 years	31/08/2024	ODBE	Governor at St Andrew's Primary School, Buckingham.	22/3/2023	31/08/2024

A copy of the LGB meeting minutes can be made available by request from the clerk via (email)

LGB Meeting Attendance 2023-24

LGB Meetings

Title	First Name	Surname	Term 1	Term 2	Term 3	Term 4	Term 5	Term 6
Mrs	Test	Example						

Key: = Present, A = Apologies Received. P = Part Attendance. Ab = Absent. N/A = Not appointed