



GOVERNORS' POLICY ON INTEGRITY

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GOVERNORS' POLICY ON INTEGRITY

1.0 INTRODUCTION

1.1 All staff and governors must act in accordance with this policy which lays down the required standards and practice in respect of the following:

- combating fraud;
- the disclosure of malpractice (Whistleblowing);
- Business and other interests;
- gifts and hospitality

1.2 By complying with the policy (including the declaration of any interests they may have and of any gifts and hospitality they may receive) staff and governors are protecting themselves from any false accusation of perception of malpractice, corruption or bias.

2.0 THE EXPECTED STANDARDS OF INTEGRITY

2.1 All staff and governors must act honestly and with integrity at all times and in accordance with the Seven Principles of Public Life (see Appendix 1).

2.2 All those with responsibility for the public resources under the school's control must take all reasonable steps to safeguard them.

2.3 All staff must act with propriety in the use of resources and the handling and use of public funds.

2.4 All prescribed financial procedures designed to reduce the possible risk of malpractice (as outlined in the Backwell School Financial Handbook) must be applied strictly and impartially at all times.

2.5 All staff have a responsibility to act in good time to prevent or report fraud or corruption and to co-operate fully with any internal checks, reviews or fraud investigations.

2.6 Staff should report any financial malpractice or suspected malpractice in good faith and may make use of the Whistleblowing Procedure to do so (see Section 4 and Appendix 3).

2.7 Governors and those staff identified in paragraph 5.1 are required to make a declaration of Business and other interests at least once a year.

2.8 All other employees must declare in writing to the Headteacher any financial or non-financial interests which could reasonably be considered to conflict with the school's interests (see Section 5).

2.9 All staff and governors must exercise common sense and consult section 6 before considering accepting gifts or hospitality from outside individuals or organisations to ensure that their integrity is not questioned nor the school compromised.

3.0 COMBATING FRAUD

- 3.1 The prevention of fraud (which incorporates a number of criminal activities – see Appendix 2) is to be understood as both a corporate and an individual imperative.
- 3.2 All staff and governors should be alert to the possibility that unusual events or transactions could be indicators of fraud.
- 3.3 All staff and governors should make themselves aware of the appropriate channels through which a suspected fraud should be reported (see also Section 4).
- 3.4 All staff and governors have a duty to co-operate fully with whoever is conducting internal checks, reviews or fraud investigations.
- 3.5 Both the Chair of Governors and all staff in management posts will ensure that an adequate system of internal controls exists within their areas of responsibility and that the controls operate effectively.
- 3.6 The Headteacher, as Accounting Officer, will ensure that a sound system of internal control designed to manage the whole range of risks faced by the school is in place and fully operational.
- 3.7 The School Business Manager has overall responsibility for managing the risk of fraud, including:
- completing the DfE Fraud Indicators Checklist
 - undertaking a regular review of fraud risks;
 - designing and monitoring effective controls to prevent fraud;
 - reporting fraud risk issues and incidents of fraud or suspected fraud to the Headteacher (Accounting Officer);
 - external reporting in compliance with company and charity law and accounting standards;
 - ensuring that suspicions or allegations of fraud are promptly and vigorously investigated;
 - alerting the Headteacher to the need for legal and/or disciplinary action for fraud, supervisory failures or failure to report fraud;
 - taking appropriate action to recover assets;
 - ensuring that appropriate action is taken to minimise the risk of similar frauds occurring in future.
 - Reviewing the Fraud Policy to ensure it is operating effectively.
- 3.8 The Responsible Officer, the Auditor and the Finance and Buildings Committee each has a duty to help managers reduce the risk of fraud and to deter and prevent it.
- 3.9 All instances of fraud or theft committed against the trust, whether by employees, trustees or third parties, above £5,000 will be reported by the trust to the EFA. Any unusual or systematic fraud, regardless of value, will also be reported.

4.0 THE DISCLOSURE OF MALPRACTICE (WHISTLEBLOWING)

- 4.1 The Governing Body has adopted the Whistleblowing Procedure (see Appendix 3) as

their official code of practice on the disclosure of malpractice.

- 4.2 All staff should make themselves aware of the Whistleblowing Procedure as one means to help them fulfil the duties described in paragraphs 2.5, 2.6, 3.1 and 3.3 above.
- 4.3 Governors and senior managers must ensure that the safeguards for informants described in the Whistleblowing Procedure are implemented fairly and energetically.
- 4.4 Governors who suspect fraudulent activity should raise their concerns initially with either the Chair of Governors or the Headteacher, as they think most appropriate to the circumstances.

5.0 BUSINESS AND OTHER INTERESTS

- 5.1 The following have a duty to make a Declaration of Pecuniary and Personal Interests and to update it as necessary (and in any case at least once a year): all governors; the Headteacher; the Deputy Headteachers; the School Business Manager and all other staff working in the Finance Office; the ICT Network Manager; the Facilities Manager and any head of a department who is responsible for a budget in excess of £10,000. If appropriate they must make a nil return. The Declaration pro forma is shown in Appendix 5.
- 5.2 All other employees have a duty to advise the Headteacher in writing of all relationships of a business or private nature with contractors and suppliers of goods and services (with which the school might trade) and of any financial or non-financial interests which could reasonably be considered to conflict with or impact on the school's interests.
- 5.3 The School Business Manager's PA will ensure that all declarations under paragraphs 5.1 and 5.2 are kept in a Register of Business Interests (Declaration of Pecuniary and Personal Interest), maintained in accordance with Appendix 6 and details published on the website as required by the Academies Financial Handbook.
- 5.4 In considering whether there is an interest to be declared, staff and governors should consider whether a member of the public, knowing the facts of the situation, could reasonably think that a personal interest or relationship might conflict with or impact on the interests of the school.
- 5.5 Anyone with a business interest in a potential contract should not take part in drawing up the specification and/or tender document.
- 5.6 Any member of staff or governor with a business interest in a particular decision should not normally take part in the process leading to that decision.
- 5.7 All persons having power to spend or to participate in discussions to spend monies on behalf of the school or any of its students must observe the following procedures:
 - 5.7.1 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 students, that person should consider whether to make a declaration and subsequently withdraw from further discussion regarding the issue.
 - 5.7.2 A declaration should be made if the person concerned is aware that the recipient of the

expenditure or benefit is or might be:

- (a) him/herself
- (b) his/her employer or employee
- (c) a business in which he/she has an interest (however remote)
- (d) a member of his/her extended family
- (e) a friend or
- (f) someone to whom an obligation (either legal or moral) is owed.

- 5.7.3 A 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.
- 5.7.4 If the person making the declaration is only one of a number participating in the decision-making process, the declaration should be made to the other participants. They should consider, taking into account the amount of the expenditure, whether the individual is the only 'expert' in the area, the nature of the connection and other relevant circumstances, whether to invite the person to exclude him/herself from the discussion. It would be best practice for the individual to remove themselves from the decision-making process.
- 5.7.5 If the person making the declaration is the only person making the decision on expenditure, the declaration should be made to the Headteacher. The Headteacher 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.
- 5.7.6 If the person making the declaration is the Headteacher, the declaration should be made to the Finance and Buildings Committee, who should thereupon make the decision, excluding the Headteacher from the discussions.

6.0 GIFTS AND HOSPITALITY

- 6.1 All staff and governors must abide by the standards and procedures in this section of the policy when considering whether to accept gifts, benefits or hospitality.
- 6.2 Offers of hospitality should only be accepted if there is a genuine need to represent the school.
- 6.3 Examples of when it may be proper to accept hospitality (always depending upon the particular circumstances) are as listed in sub- paragraphs 6.3.1 to 6.3.4, but overnight hospitality should never be accepted.
- 6.3.1 Attendance at conferences, events and demonstrations of equipment organised by outside bodies where the school has an interest.
- 6.3.2 Attendance at events or functions where there is a demonstrable need for the school to be represented to either give or to receive information or to participate as part of the school's corporate image.

- 6.3.3 Attendance at events or functions which are part of the civic, cultural or sporting life of the school.
- 6.3.4 Working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level.
- 6.4 Gifts should only be accepted in the exceptional cases listed in paragraphs 6.5 and 6.6.
- 6.5 The following types of gift may be accepted:
 - 6.5.1 modest gifts of a promotional character, e.g. calendars, diaries and other similar articles;
 - 6.5.2 gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation;
 - 6.5.3 small gifts, which are defined as being up to £25 in value.
- 6.6 Gifts which are intended for the school may be accepted, but must be passed to the Headteacher to receive and record on behalf of the Governing Body.
- 6.7 Upon receipt of any gift (other than small gifts given as “thank you” by students to tutors or subject teachers, for example at Christmas or at the conclusion of a course) or hospitality, staff and governors must provide written notification to the Headteacher within two weeks using the Declaration of Gifts and Hospitality pro forma (see Appendix 9). The School Business Manager shall receive the Declarations (once countersigned by the Headteacher) and keep them in a Register of Gifts and Hospitality, which shall be maintained in accordance with Appendix 7.

The Seven Principles of Public Life

Selflessness

Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends or businesses.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might 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.

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.

Fraud, etc: Some Useful Definitions

Theft - Dishonestly appropriating the property of another with the intention of permanently depriving them of it (Theft Act 1968). This may include the removal or misuse of funds, assets or cash.

False Accounting - Dishonestly destroying, defacing, concealing, or falsifying any account, record, or document required for any accounting purpose, with a view to personal gain for another, or with intent to cause loss to another or furnishing information which is or may be misleading, false or deceptive (Theft Act 1968).

Bribery and Corruption - The offering, giving, soliciting or acceptance of an inducement or reward that may influence the actions taken by the authority, its members or officers (Prevention of Corrupt Practices Acts 1889 and 1916).

Deception - Obtaining property or Business advantage by deception (Sections 15 and 16 of the Theft Act 1968 (and obtaining services or evading liability by deception (Sections 1 and 2 of the Theft Act 1978).

Collusion - The term "collusion" in the context of reporting fraud to the Treasury is used to cover any case, in which someone incites, instigates aids and abets, or attempts to commit any of the crimes listed above.

WHISTLEBLOWING PROCEDURE

1.0 INTRODUCTION

- 1.1 Backwell School expects the highest standards from all employees, and will treat seriously any concern that an employee may have about suspected illegal or improper conduct.
- 1.2 Employees are often the first to realise that there may be something seriously wrong within the school. Their concerns might relate to matters that could affect the school itself and/or the school's employees or the wider public. However, employees may not want to express their concerns because they feel that speaking up would be disloyal to their colleagues or to the school. They may also fear harassment or victimisation. In these circumstances they may feel that it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.
- 1.3 The Public Interest Disclosure Act 1998 (see Appendix 4) affords statutory protection to 'whistleblowers' in certain circumstances. Under the Act, a worker has the right not to suffer detriment or be unfairly dismissed as a result of speaking out about malpractice. If an employee is dismissed solely in these circumstances he/she is likely to be treated by an Employment tribunal as unfairly dismissed.
- 1.4 Backwell School is committed to the highest possible standards of openness, integrity and accountability. In line with that commitment, employees and others with serious concerns about any aspect of the school's work are encouraged to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis. This procedure makes it clear that, in addition to the protection afforded by the Public Interest Disclosure Act (1998), the school will ensure that in all cases staff can do so without fear of reprisals. This Whistleblowing Procedure is intended to encourage and enable staff to raise concerns within the school rather than overlooking a problem.
- 1.5 This procedure has been discussed with the Recognised Trade Unions and has their support. It explains how Backwell School meets its obligations under the Public Interest Disclosure Act 1998.
- 1.6 This procedure can be used by any person who works or who has worked for the school regardless of whether:
- the work was full or part time; or
 - the work was temporary or permanent; or
 - an employment agency was involved; or
 - the person involved was a trainee or on work experience; or
 - the person involved was working for a contractor.

2.0 WHAT IS THE PURPOSE OF THE PROCEDURE?

- 2.1 This procedure is designed to enable all employees (identified in paragraph 1.6 above) to notify senior colleagues/governors of any reasonable suspicion of illegal or improper conduct. 'Improper conduct' includes malpractice, neglect of duty and maladministration. The Procedure requires all employees to act responsibly to uphold the reputation of the school

and to help maintain public confidence.

2.2 The procedure aims to:

- encourage employees to feel confident in raising serious concerns and to question and act upon concerns of malpractice;
- provide avenues to raise those concerns and receive feedback on any action taken;
- ensure that employees receive a response to their concerns and are aware of how to pursue them if they are not satisfied; and
- reassure employees that they will be protected from possible reprisals or victimisation if the disclosure was made in good faith.

3.0 WHEN SHOULD IT BE USED?

3.1 There are other existing procedures in place to enable employees to lodge a grievance/harassment complaint relating to their own employment. Employees will generally be precluded from being able to use this procedure regarding breaches of their own employment contract. This Whistleblowing Procedure is intended to cover concerns that fall outside the scope of other procedures.

3.2 Thus, this procedure should be used in matters which may include:

- conduct which is an offence or a breach of the law, including:
 - disclosures related to actual or potential miscarriages of justice;
 - health and safety risks, including risks to the public as well as other employees;
 - damage to the environment;
 - any attempt at concealing the above.
- any concerns that employees have about any aspect of service provision or the conduct of employees, governors or elected members of the school, or others acting on behalf of the school. This may be about:
 - something that makes them feel uncomfortable in terms of known standards, their experience or the standards they believe the school subscribes to; or
 - something that is against the School Procedures, Rules and Policies; or
 - something that falls below established standards of practice; or
 - something that amounts to malpractice or improper conduct; or
 - the unauthorised use of public funds; or
 - fraud and corruption; or
 - homophobic, racial, religious, sexual or physical abuse of clients, staff, governors/members; or
 - other unethical conduct.

3.3 Employees must have a reasonable belief that the information they disclose and any allegation contained in it are accurate. When it is apparent from the investigation that the person making the disclosure has acted frivolously, maliciously or for personal gain, the school may decide to take disciplinary action against them. If the disclosure itself amounts to a criminal offence, this procedure will not protect the employee from the consequences of that criminal offence.

3.4 An employee who is not sure whether the conduct or omission he/she is concerned about does constitute illegal or improper conduct, or is unsure how to proceed, can contact the following for advice:

- Headteacher
- Any Manager
- Chair of Governors
- Human Resources

3.5 Financial Procedure Rules require employees who suspect fraud, corruption or other financial irregularity, to ensure this is reported to the Headteacher for possible investigation. Normally, the employee must first report any suspicion of such irregularity to the Headteacher, who will in turn report it to the chair of governors. In most cases this will be done through the line management structure. Exceptionally, if employees believe the matter cannot be resolved in this way, they should report it direct to the chair of governors.

4.0 MECHANISM FOR RAISING CONCERNS

4.1 If employees have a concern they will need to exercise a judgment regarding the person who should be approached with the issue. If the matter is minor, then it will be sufficient just to bring it to the attention of the employee who appears to be at fault. The alternative would be raising the concerns directly through school line management channels.

4.2 If the matter is obviously more significant, or where a previous informal approach as above has apparently not proved effective or been disregarded, then the matter should be raised with the Headteacher or chair of governors.

4.3 Exceptionally, if the employee feels unable to pursue any of these routes, s/he should consider approaching an appropriate body outside the school. Such bodies include:

- The Audit Commission (for financial irregularities);
- The independent charity “Public Concern at Work”, which offers confidential advice (020 7404 6609) to employees and others with serious concerns about public dangers and malpractice;
- The employee’s Trade Union.

If the employee does take the matter outside the school, he/she needs to ensure that confidential information is not disclosed or that disclosure would be privileged. It is suggested the employee checks this with the contact person at the outside body.

4.4 Depending on the nature of the concern, the employee may be asked to explain, and where possible, justify and support the claim. An employee will not be expected to prove the truth/accuracy of an allegation, but will need to demonstrate to the person contacted that there are sufficient grounds for concern. Normally the employee will be asked to do this in writing, or agree to a written summary prepared by the person notified. It would therefore be helpful for the employee, if possible, to note down any facts and dates as they happen.

4.5 Employees who want to use the procedure, but feel uneasy about doing so, may wish to consult their Trade Union initially, and bring a colleague or Trade Union representative along to any discussions, so long as that colleague or Trade Union representative is independent of the issue.

- 4.6 Where anonymity is requested, every effort will be made to meet the request, but that might not always be possible. The earlier and more open the expression of concern, the easier it will be to take appropriate action.
- 4.7 Normally, each case will be investigated thoroughly, with the aim of informing the employee in writing of the outcome of any investigation as quickly as possible, normally within 21 days. If a more lengthy process is involved, regular feedback in writing on progress will be given to the employee who made the disclosure. Some concerns may be resolved by agreed action without the need for investigation, although in such cases a record of the disclosure and the action taken will be made by the school and a copy of such written report provided to the employee who made the disclosure.
- 4.8 The school accepts that an employee who has acted as a whistleblower will need to be assured that the matter has been properly addressed. Subject to legal constraints, such employees will receive information in writing about the outcomes of any investigations

5.0 WHAT TO DO IF AN ISSUE IS RAISED WITH YOU AS LINE MANAGER

- 5.1 You must exercise judgment, depending on the nature and seriousness of the concern. While it is essential for problems to be tackled effectively with the aim of rectifying the issue, this may well be best achieved in less serious cases by discussion with the relevant section or employee and securing a commitment as to future standards and corrective action. In taking any corrective action, you must, as far as practicable, respect an employee's (as a whistleblower) request for confidentiality, and avoid the threat of recrimination or reprisals. You should notify your own line manager in writing of the action you have taken.
- 5.2 In other more serious cases, you should pass the matter up to the Headteacher or Chair of Governors. If you believe that school management is involved, you should approach your union.
- 5.3 If you have any doubts about the right way to deal with the concern, you should contact one of the persons named in paragraph 3.4 or 4.5 above for advice.
- 5.4 All employees should be reassured that their concerns will be treated seriously and sensitively, and that Backwell School will not tolerate harassment and/or victimisation of any employee raising concerns.

THE PUBLIC INTEREST DISCLOSURE ACT 1998

This legislation aims to protect workers who make “qualifying disclosures” of malpractice in their organisation from victimisation as a result of making such a disclosure. It is automatically unfair to dismiss an employee or select him/her for redundancy because he/she made a disclosure, provided that the disclosure qualifies under the Act.

A “qualifying disclosure” must relate to:

- a criminal offence;
- a failure to comply with any legal obligation;
- a miscarriage of justice;
- danger to health and safety of any individual;
- damage to the environment;
- an attempt to cover up any of these.

Any disclosure must be made in good faith and not for personal gain. The employee does not have to prove that malpractice has occurred, simply that he/she has a reasonable belief that it took place or was about to take place.

The Act directs workers to raise their concerns internally in the first place, wherever their employer has a procedure for doing so. In certain cases the Act also protects disclosure to “prescribed regulators” such as the Audit Commission.

The Act only protects wider disclosure (e.g. to the media, an MP etc) if:

- the employee reasonably believed they would be victimised if they had raised the matter internally or with a prescribed regulator;
- there was no prescribed regulator and they reasonably believed the evidence would be concealed;
- the concern had already been raised with the employer or prescribed regulator;
- the concern was exceptionally serious.



Declaration of Pecuniary and Personal Interest

Name:

School:

Position:

I declare as a Governor/Trustee of Backwell School that I hold the following personal and/or pecuniary interest(s):

Pecuniary interests	Please provide details of the interest
Current employment	
Businesses (of which I am a partner or sole proprietor)	
Company directorships – details of all companies of which I am a director	
Charity trusteeships – details of all companies of which I am a trustee	
Membership of professional bodies, membership organisations, public bodies or special interest groups of which I am a member and have a position of general control or management	
Gifts or hospitality offered to you by external bodies while acting in your position as a governor/trustee and whether this was declined or accepted in the last 12 months	
Contracts offered by you for the supply of goods and/or services to the trust/school	
Any other conflict	

Personal interests	Name	Relationship to me	Organisation	Nature of the interest
Immediate family/close connections to governor/trustee				
Company directorships or trusteeships of family/close connections to governor/trustee				

If you are a governor or trustee of any other schools and/or academies, please provide details below:

Name of school/academy:

Position held:

Date appointed/elected to post:

Date of termination to post:

To the best of my knowledge the information supplied above is correct and complete. I understand that it is my responsibility to declare any conflict of interest/loyalty, business or personal that relates directly or indirectly, to myself or any relation in any contract, proposed contract or other matter when present at a meeting at the school where such contract or matter comes under consideration. I understand that I must withdraw from any meeting during the discussion of such contract or matter and must not vote in respect of it.

I agree to review and update this declaration annually and give consent for the information provided to be used in accordance with the trust/school's Integrity Policy. Should this information alter during the course of the year, I agree to update the school accordingly.

I accept that in the interest of open government my name, term of office, roles on the governing body, category of governor and the body responsible for appointing us will be published on the school's website.

Signed:

Date:

Guidance notes

Governors and trustees have a legal duty to act only in the best interests of their schools. Where a situation arises in which they cannot do this due to a personal interest they have, steps should be taken to identify, prevent and record the conflict. This ensures governors or trustees are acting in the best interests of the school.

In the declaration above, you must provide details relating to:

- Your ownership or partnership of a company or organisation which may be used by the trust/school to provide goods or services;
- Goods or services you offer which may be used by the trust/school;
- Any close relation you have to someone who satisfies either of the above;
- Any close relationship you have to someone who is employed by the trust/school.

Declaring your conflicts of interest is a legal requirement within the School Governance (Roles, Procedures and Allowances) (England) Regulations 2013 and for academies, in the Articles of Association and Academies Financial Handbook. However, making an annual declaration does not remove your requirement to make an oral disclosure of the interest and temporarily leave the meeting, where the interest is relevant to something being discussed.

Pecuniary interests

Generally, governors should not participate in any discussions in which they may directly or indirectly benefit from a pecuniary interest, except where the relevant authority has authorised this i.e. legislation for maintained schools or articles of association for academies. A direct benefit refers to any personal financial benefit and an indirect benefit refers to any financial benefit you may have by virtue of a relationship to someone who stands to gain from a decision of the governing board. Both direct and indirect interests must be declared.

Non-pecuniary interests (Conflicts of loyalty)

There may be a non-pecuniary interest whereby the governor does not stand to gain any benefit but a declaration should still be made. For example, this might be where a governor has a family member working in the school. While the governor might not benefit personally, their judgment could be impaired if something was brought up that would affect the family member.

Handling the conflict

The governing board must make a decision as to whether or not they should take steps to remove the conflict by:

- Not pursuing the course of action it relates to; or
- Proceeding with it in an alternative way which does not give rise to conflict; or
- Not appointing the governor in question or seeking to secure their resignation.

In the minutes of the meeting, the following should be recorded:

- The nature of the conflict;
- Which governor(s) it relates to;
- Whether a declaration was made in advance of the meeting;

- A brief overview of what was discussed;
- Whether the governor(s) withdrew from the meeting;
- How the governors made the decision in the best interests of the school.

The School and Early Years Finance (England) Regulations 2013 provide for local authority financing schemes to keep a register of pecuniary interests for the trustees, governors and staff of schools. The register should be reviewed annually by the clerk to the governing body but any new interest or ceased interest, should be reported to the clerk as and when they occur. Upon completion, this signed form should be given to the clerk of governors whose responsibility it is to keep a register of all interests and review it annually. You can find NGA's model conflict register on the [NGA's website](#).

The Charity Commission has produced [guidance on dealing with conflicts of interests](#) which may be useful, even for schools that do not have charitable status.

The Register of Business Interests

1. The School Business Manager's PA shall hold the Register of Business Interests (Declaration of Pecuniary and Personal Interest) and shall be responsible for reminding staff and governors of their obligations in relation to it. The Register shall be held for a minimum of seven years.
2. Ongoing disclosures need to be submitted in every return, even if they have been previously disclosed. The Register is a living document and the previous returns form part of the Register. The returns should be kept for seven years.
3. The Register is accessible for viewing during normal school hours by the following: the Headteacher, Deputy Headteachers, Finance Manager, School Business Manager, Responsible Officer, and Auditor.
4. Any request by a member of the public to view the Register will be referred to the School Business Manager. In considering any request, the School Business Manager will balance the requirements of the Data Protection Act 1998 and of Article 8 of the Human Rights Act, and reach a judgment in each specific case.
5. The Governors' Finance and Buildings Committee will be informed by the School Business Manager each Autumn Term that the Register has been fully updated.

The Register of Gifts and Hospitality

1. The School Business Manager shall hold the Register of Gifts and Hospitality and shall be responsible for reminding staff and governors of their obligations in relation to it.
2. The Headteacher shall countersign all Declarations of Gifts and Hospitality made by employees, authorising or refusing acceptance.
3. Ongoing disclosures need to be submitted in every return, even if they have been previously disclosed. The Register is a living document and the previous returns form part of the Register. The returns should be kept for seven years.
4. The Register is accessible for viewing during normal school hours by the following: the Headteacher, Deputy Headteachers, Finance Manager, School Business Manager, Responsible Officer, and Auditor.
5. Any request by a member of the public to view the Register will be referred to the School Business Manager. In considering any request, the School Business Manager will balance the requirements of the Data Protection Act 1998 and of Article 8 of the Human Rights Act, and reach a judgment in each specific case.
6. The Governors' Finance and Buildings Committee will be informed by the School Business Manager each Autumn Term that the Register has been fully updated.



DECLARATION OF GIFTS AND HOSPITALITY RECEIVED

Name:

Role:

Description of gift/hospitality received:

Estimated/Actual Value: £

Signature of Employee: Date:

Note by Headteacher :

I have authorised acceptance/denied acceptance of this gift/hospitality because:

Signed: Date: