



Register of Interests Guidance

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Version	Date	Author	Changes
V1.0	October 2015		Initial Issue
V2.0	March 2019	Louise Beale	Review and update template
V3.0	June 2021	Louise Beale	Reflect new governance structures
V3.1	June 2021	Louise Beale	Add related parties transaction information
V3.2	June 2024	Louise Beale	Update of references to ATH (from AFH), update to section 3.1, related parties and examples added to section 4, addition of para 5.4

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Lead/owner	Head of Operations and Compliance
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The electronic version is the definitive version of this document.

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1. Introduction

- 1.1. The Diocese of Coventry Multi Academy Trust (the Trust) and its academies recognise their responsibility for ensuring that the Trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the Academy Trust Handbook.
- 1.2. The Trust and its academies are committed to ensuring the proper stewardship of its funds; ensuring value for money through economy, efficiency and effectiveness in their use.
- 1.3. Members, Directors and committee members (committee members referred to includes members of Academy Governance Committees (AGCs) throughout this document) are required to act in accordance with the Seven Principles of Public Life, as defined by the Nolan Committee.
- 1.4. No Member, Director, committee members, employee or related individual or organisation may use their connection to the Trust or academy for personal gain, including payment under terms that are preferential to those that would be offered to an individual or organisation with no connection to the Trust.

2. Definitions

- 2.1. **A business interest** is the involvement of an individual or their family members in any trade or professions, along with any direct interest they may have in any company. When making a decision about what or what not to declare, the individual should consider how they may be challenged about their decision not to disclose information.
- 2.2. **A pecuniary interest** is a wider interest than a business interest. It includes personal financial interests, such as involvement in a trust fund, investments and assets including land and property, as well as potential interests which may not always be clear in advance such as the appointment of a member of staff or award of a contract to a company which is known to the individual. Provision must be made for an individual to declare an interest at any meeting.
- 2.3. Members, Directors, committee members, Trust Leaders, senior members of staff and staff with financial responsibility at the Trust and in the academies are required to complete a **declaration of pecuniary and business interest form**, which will be reviewed at least annually.
- 2.4. The Trust and each academy are required to maintain their own **register of interest**, which should be reviewed annually and published on the academy or Trust website.

3. Related Party Transactions

- 3.1. To ensure compliance with the requirements of the Academy Trust Handbook (ATH), we must obtain ESFA's prior approval, for related party transactions starting on or after 1 September 2023, that exceed £40,000 for the supply of goods or services to the trust by a related party in the same financial year ending 31 August. For transactions with a start date on or before 31 August 2023, we must obtain approval for transactions where the cumulative threshold is over £20,000. These requirements do not apply to the provision of services to an academy trust with a religious designation, for essential functions fundamental to the academy trust's religious character and ethos which can only be provided by their religious authority.
- 3.2. Related parties are identified as persons or entities with control or significant influence over the academy trust e.g., parent or subsidiary companies/organisations, trust sponsor, key management personnel including directors, close family members of any of the above, to name but a few. In an academy trust, typical examples include directors, members, finance staff, academy leaders, governors and those with budget/expenditure authority who are 'connected' to the potential supplier.

3.3 The key issue is ESFA notification and/or approval must be obtained prior to entering into the transaction.

4. Declaration of Pecuniary, Business and Related Party Interests Form

4.1. Due to the need to identify 'related parties' at the start of the purchasing process i.e., before any commitment is made with the potential 'related party' supplier, there is a need to declare business and pecuniary interests.

4.2. Declarations of business and pecuniary Interests should be made on the Trust Declaration of Business and Pecuniary Interests form, which includes the following fields:

Name of Business	Name of Related Party	Nature of Business / Role of Related Party	Nature of Interest / Relationship	Start Date of Interest	Date of Cessation of Interest
Eg. A School, A Town	Eg. John Smith	Headteacher / Governor	Son	September 2023	Ongoing
Eg. KidsClub Wraparound Care	Eg. Jane Smith	CEO / Owner	Partner	September 2009	June 2024

4.3. Along with a signature and date of declaration, the form includes the following declaration:

I certify that I have read the Trust's current Register of Interests Guidance and declared all beneficial interests which I, or any person closely connected with me, have with businesses or other organisations, including trusteeships and governorships at other educational institutions and charities, which may have dealings with the Diocese of Coventry Multi Academy Trust and/or any of its academies.

5. Register of Interests

5.1. The Register of Interest must capture relevant business and pecuniary interests of Members, Directors, committee members and senior employees within the Trust. Including:

- Directorships, partnerships and employments with any business
- Trusteeships and governorships at other educational institutions and charities
- For each interest the name of the business, the nature of the business the nature of the interest and the date the interest began should be recorded

5.2. The register must also identify any material interests arising from close family relationships between the Trust's Members, Directors or committee members, and relationships between Members, Directors, Committee members and employees. Close family relationships is defined as a close member of the family, or a member of the same household, who may be expected to influence or be influenced by the person. This includes but is not limited to a child, parent, spouse or civil partner.

5.3. Information from individual business and pecuniary interest returns should be compiled into a Register of Interest which must be published on the academy website. A register of Interest for the Trust Members, Board, committee members and senior leaders will be published on the Trust website.

5.4. The Register of Interests should be a 'live' document and therefore Members, Directors, committee members and staff should notify the Trust central team as soon as possible, of a change in their interests.

5.5. Headings for Register of Interest are as follows:

Name	Pecuniary and Business Interests	Educational Establishments	Relationships	Date of Declaration

6. Forms

Trust Declaration of Business and Pecuniary Interests form available from
Information Hub / Forms, Policies and Templates/Central Forms/Governance