



KEYSTONE ACADEMY TRUST

Register of Interests – Finance Policy

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It is important for anybody involved in spending public money to demonstrate that they do not benefit personally from the decisions they make. The board of trustees MUST ensure requirements for managing related party transactions are applied across the trust. The board chair and the accounting officer MUST ensure their capacity to control and influence does not conflict with these requirements. They MUST manage personal relationships with related parties to avoid both real and perceived conflicts of interest, promoting integrity and openness in accordance with the “The 7 principles of public life”.

To avoid any misunderstanding that might arise all trust members and trustees (including the local governing boards) and Senior Leadership Staff are required to declare any financial interests they have in companies, organisations or individuals from which the trust may purchase goods or services.

The register MUST include the following:

- Directorships, partnerships and employments with businesses
- Trusteeships and governorships at other educational institutions and charities
- For each interest: the name and nature of the business, the nature of the interest, and the date the interest began
- The relevant material interests from close family relationships between the trust’s members, trustees or local governors. It MUST also identify relevant material interests arising from close family relationships between those individuals and employees. This can include a parent/spouse/sibling/business partner where influence could be exerted over a member/trustee or a member of staff by that person.

The register should be kept up to date at all times and held by the Clerk to the Governors for the trust and each individual school. It must be open to public inspection. The Trust MUST publish on their websites relevant business and pecuniary interests of members, trustees, local governors and accounting officers. There is discretion over the publication of interests of other named individuals on the register.

The register must include all business interests including directorships, share holdings or other appointments of influence within a business or organisation that may have dealings with the academy.

The Trust MUST report all contracts and other agreements with related parties to the Education and Skills Funding Agency (ESFA) in advance of the contract or agreement commencing, using the ESFA’s related party on-line form. Prior approval from the ESFA MUST be obtained for contracts and other agreements for the supply of goods/services to the trust by a related party if the contract exceeds £20k, or if cumulatively over the year exceeds £20k.

The trust MUST obtain ESFA’s prior approval for any contracts and other agreements with related parties that are novel, contentious and/or repercussive, regardless of value through the on-line form.

No member, trustee, local government, employee or related individual or organisation must use their connection with the trust 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.

The Trust MUST pay no more than “cost” for goods/services provided to it by the following persons:

- Members/trustees of the trust
- Individuals or organisations related to a member/trustee of the academy trust
- Any individual/organisation given the right under the trust’s articles of association to appoint a member or trustee of the academy trust; or anybody connected to such an individual or organisation
- Any individual or organisation recognised by the Secretary of State as a sponsor of the trust, or anybody connected to such an individual/organisation.

The “at cost” requirement does not apply to the trust’s employees unless they are also one of the parties described above. The “at cost” requirement applies to contracts with a related party exceeding £2,500, cumulatively, in any one financial year. Where a contract exceeds £2,500 then the element above £2,500 MUST be at no more than cost. Open book accounting should be used.

The existence of a register of business interests does not, of course, detract from the duties of members/trustees and staff to declare any interests whenever they are relevant to Trust matters. Where an interest has been declared, members/trusts and staff should not attend that part of any committee or other meeting where the matter is discussed and should not be involved in the decision-making around the related party. Members/trustees are also not allowed to accept benefits from third parties.

Disclosure of an interest does not inhibit the trust from using a particular company, organisation or individual so long as it is an arms-length transaction, the appropriate purchase procedure has been followed (for example multiple quotes obtained for work) and the company / organisation / individual is chosen on the basis of best value.