



**NEWMAN CATHOLIC COLLEGE**

# **Conflict of Interest Policy for Schools**

GOVERNING BODY APPROVAL: 5<sup>th</sup> December 2024

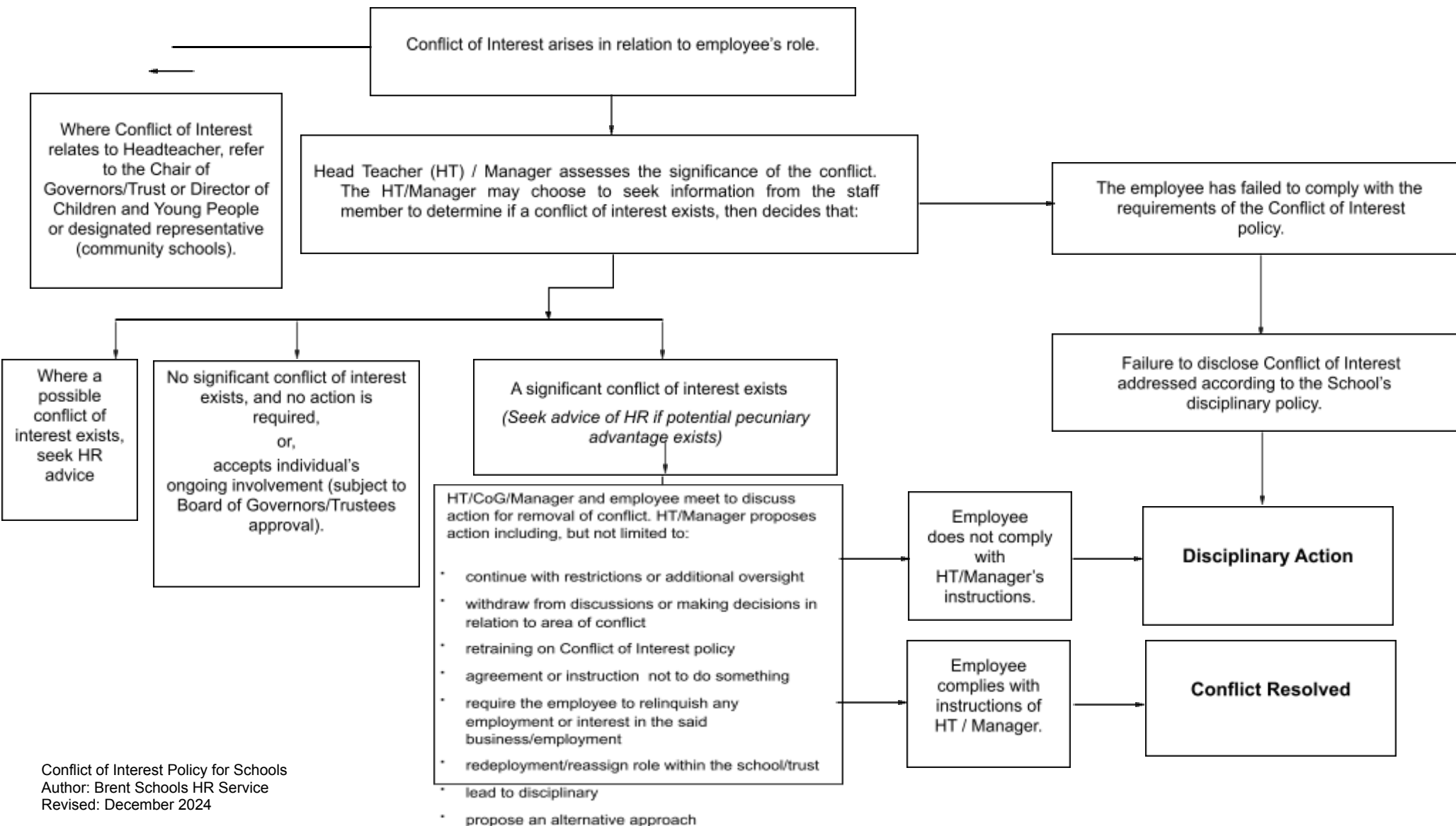
COMMITTEE WITH RESPONSIBILITY FOR MONITORING AND REVIEW: [CURRICULUM COMMITTEE](#)

NEXT REVIEW DATE: Autumn 2025

## Contents:

Flow Chart – Taking Action at a Glance	3
Aims and Objectives	4
What is a conflict of interest?	4
Definitions	5
Legal Context	6
Scope	6
The Policy	7
Roles and Responsibilities .....	8
Head Teacher / Governor / Trustee /Manager Responsibilities	8
Employees Responsibilities	9
Exceptions .....	10
Managing Conflict of Interest Situations	11
Data Protection	13
Storage and Disposal of Data	13
Policies to be considered in relation to the Conflict of Interest Policy	13
APPENDIX A - School's/Trust's Declaration of Interests Form – Guidance Notes	14
APPENDIX B - School's/Trust's Declaration of Interests Form	16

## Flow Chart – Taking Action at a Glance



# The Policy

---

## Aims and Objectives

This policy operates in conjunction with the School's/Trust's Code of Conduct for employees and the Disciplinary Procedure. It sets out the school's/trust's policy in relation to the declaration of interests of employees, and the school's/trust's expectations of employees where a conflict of interest or a potential conflict of interest arises.

The purpose of the policy is to:

- Protect the school/trust and employees against conflicts of interest and allegations of impropriety.
- Ensure staff are aware of situations that may generate conflicts of interest;
- Ensure that activities undertaken are in the best interests of students, staff and the School/Trust as a whole.

It is required that declarations of interest are included as part of the school's/trust's normal audit procedures.

## What is a conflict of interest?

A conflict of interest is a situation in which an individual has competing interests or loyalties that could lead to the individual's obligations to the School/Trust being influenced and which could result in the individual's personal gain, or gain to a relevant person, whether financial or otherwise.

Conflicts of interest may arise in relation to internal or external situations, as well as the character or actions of individuals.

A conflict of interest occurs when an individual's ability to exercise judgement or act in the best interests of the School/Trust could be impaired or otherwise influenced by their involvement in another role or relationship. The individual does not need to exploit their position or obtain an actual benefit, financial or otherwise, for a conflict of interest to occur. A potential for competing interests and/or a perception of impaired judgement or undue influence can also be viewed as a conflict of interest. A conflict of interest exists even where there is the possibility that an individual's personal or wider interests could influence the individual's decision-making and even the perception that there is a conflict can damage the trust.

A conflict of interest can exist in several kinds of situations such as:

- With an employee whose personal interests' conflict with their professional position
- With an employee who works for one organisation but who may have personal interests that compete with their employment
- With an employee who has a position of authority in one organisation that conflicts with their interest in another organisation
- With an employee who has conflicting responsibilities.

Examples include (but are not exhaustive):

- A member of staff is related to a child within the School/Trust
- An SLT member has a close friendship with one of the families
- A member of staff has a close/personal relationship with one of the governors or Headteacher/SLT
- A Headteacher has a prior personal relationship or business interest with someone who is then recruited/engaged to provide services for the School/Trust

- A member of staff holds second employment or provides professional educational services privately (e.g. self-employment or a consultant contracted through another business)
- A member of staff has a connection with families within the School/Trust through social networking
- A member of staff provides babysitting or other services for a family within the School/Trust.

It is not acceptable for an individual's actions or decisions made in the course of their employment to be determined by considerations of personal gain, other than normal aspirations and behaviours related to promotion or professional development. Such behaviour calls into question the professional objectivity and ethics of the individual and reflects negatively on the School/Trust.

The School/Trust is an institution of public trust; members of staff must respect that status and conduct their affairs in ways that will not compromise the integrity of the School/Trust, by avoiding and minimising conflicts of interest, and behaving responsibly where conflict of interest situations arise.

It is also important to acknowledge that conflicts of interests will arise, however the School/Trust must be made aware of these conflicts in order that they can be managed safely and not impact detrimentally on the School/Trust.

## **Definitions**

In this policy, a "relevant person" means a spouse, partner, friend, relative, business or business associate.

This policy does not include relationships with pupils.

"Partner" means a civil partner or the other member of a couple consisting of two people who are not married to each other but are living together as a couple.

"Friend" A closer relationship is implied than that of a mere acquaintance or work colleague and includes sexual relationships.

"Relative" means a parent, grandparent, child, grandchild, sibling, aunt, uncle, niece, nephew, cousin, step-child/sibling/parent, mother/father/son/daughter/brother/sister-in-law and all of the aforementioned including adoptive relationships and relationships of the full blood or half blood and including the relatives of the employee's partner. For these purposes, a relative also includes a guardian or special guardian or ward.

"Business" means any company, partnership, or other business arrangements in which the employee has an interest, whether in the form of shares, dividends, bonds, or otherwise and where the value of that interest exceeds 5% of the value of the business. Business also includes any business in which the employee is employed or has a significant interest whether paid or unpaid e.g. Trustee, Governor, Non-Executive Board member etc. "Business Interest" and "business relationship" shall be construed accordingly.

"Business Associate" means a person with whom the employee has a business relationship.

These definitions are not exhaustive. There may be other situations where exceptional loyalty may cause a conflict of interest.

## Legal Context

A contract of employment constitutes a legally binding contract between the employee and the employer and, as such, carries with it a range of rights and obligations on the part of both the employer and the employee. The contract includes a duty on the employee not to act in a way that is contrary to the interests of the employer and not to allow their own personal interests or those of their friends, family or business associates (hereinafter referred to as a “Relevant Person”) to conflict with those of their employer. If there is or is likely to be a conflict then the employee will inform the employer so that reasonable steps can be taken to protect the School’s/Trust’s interests and to protect the employee from criticism or challenge. The School/Trust is entitled to put in place a series of precautionary measures to ensure that conflicts or potential conflicts of interest are notified to the School/Trust at an early stage.

The Bribery Act 2010, and the Local Government Act 1972 are relevant. The Bribery Act 2010, makes it an offence for an employee to give advantage to someone in return for favours in relation to the School’s/Trust’s business. Section 117 of the Local Government Act 1972 requires that employees notify the employer in writing of any direct or indirect financial interests which they have in any School/Trust contracts, or proposed contracts, of which they become aware. Breach of Section 117 is a criminal offence subject to a fine.

**(Academies only)** The Companies Act 2006 and the Academy Trust Handbook 2023 are relevant. The Companies Act 2006 outlines that directors must avoid a situation where they have a direct or indirect interest that conflicts/possibly may conflict with the interests of the Trust; and must not accept benefits from third parties conferred by reason of them being a director. A director must also declare interests in proposed and/or existing transactions or arrangements.

The Academy Trust Handbook outlines that the roles of accounting officer and chief financial officer should not be occupied by the same individual; and that both roles must be employed by the Trust and be employees. Employees of the Trust must not be on the audit and risk committee.

## Scope

This policy applies to all school/trust based employees.

It is recognised that the Headteacher / Executive Leader / Principal / Chief Executive Officer and other School/Trust based employees may also be ex-officio governors/trustees and staff governors as part of their employment within the School/Trust. Where this is the case, such individuals are required to comply with both this Conflict of Interest Policy and the School’s/Trust’s Code of Conduct for Governors. Such individuals must ensure that they have made the relevant declarations by completing a Register of Business and Personal Interest Form. It is the responsibility of the Chair of Governors / Trustees / Management Committee to ensure that this requirement is fulfilled and to give active consideration to such declaration(s).

## The Policy

**Note: Where the conflict relates to the Head teacher, all actions referred to in this policy will be undertaken by the Chair of Governors/Trustees or nominated governor. It is the responsibility of the Chair of Governors/Trustees to ensure the Head teacher completes a**

**declaration of interests form on appointment of the Head teacher and when changes in their circumstances occur; and further that this form is actively considered and signed.**

Conflicts of interest can lead to decisions that are not in the best interests of the School/Trust and which are invalid or open to challenge. Even perceived conflicts of interest can damage the School's/Trust's reputation, therefore it is crucial that actual, potential and perceived conflicts of interest are declared at the earliest opportunity, enabling the School/Trust to assess the level of conflict and to decide on an appropriate course of action. The existence of a conflict of interest does not reflect on the integrity of an individual as long as it is properly addressed.

Employees should not allow their outside activities to interfere with their work and should not allow any conflicts between their duties or their private interests to affect their ability to carry out their duties effectively.

No employee should make use of or exploit the School/Trust, their connection with the school/trust, or information obtained in the course of their duties to further their own private interest.

Where such an actual or apparent conflict of interest occurs, or is about to occur, the employee will take all reasonable steps to prevent that conflict from arising or continuing. These reasonable steps may include resigning from such external positions or roles or employment.

Employees have a duty to disclose any potential or apparent conflict of interest which may affect their ability to carry out their role. Any employee who believes that they may have a conflict of interest should consult the Headteacher and complete a declaration of conflict of interest form. **(Appendix B)**. Where this relates to the Headteacher, the Headteacher will be required to discuss this with the Chair of Governors.

The School/Trust will be entitled to require employees who have a conflict of interest to take such steps as the School/Trust considers reasonable to avoid that conflict or to prevent it from continuing and these reasonable steps may include requiring the employee to resign or relinquish the other positions or roles or employment.

The School/Trust will require any employee who has a business interest in a business or partnership to whom the School/Trust intends to award a contract for works, supplies or services to take any steps required by the School/Trust to avoid any conflict or potential conflict of interest from arising or to prevent any impact or potential impact on the School's/Trust's reputation or on service delivery or management of services, staff, resources or performance or the ability of the employee to perform their job. These steps may include requiring the employee to resign from the School's/Trust's employment or relinquish any employment or interest in the said business. The School/Trust can in its absolute discretion decide not to award any contract if its requirements are not complied with or may cease to use the services of the service provider if it so wishes. Legal advice should be taken prior to making any such decision.

## **ROLES AND RESPONSIBILITIES**

### **Head Teacher / Governor / Trustee / Manager Responsibilities**

Head Teachers/Managers have a specific responsibility to:

Conflict of Interest Policy for Schools  
Author: Brent Schools HR Service  
Revised: December 2024

- Ensure all employees complete Parts 1, 2 and 3 of the Declaration of Interests form and all other parts of the form that may be relevant to them.
- Assess the completed declaration form and any possible conflicts which are revealed are discussed with the employee or prospective employee to determine whether any steps are required to remove, limit or otherwise mitigate the impact of the conflict of the conflict of interest. This paragraph applies to direct and indirect interests and “indirect interests” means the interests of a relevant person.
- When the Head Teacher/Manager becomes aware of any change in the employee’s circumstances or business or other interests such that the employee may need to update their Declaration of Interest form, that the Head Teacher/Manager ensures that the employee updates their Declaration of Interest form within 28 days of such change occurring.
- When an employee is assigned a new task or role, the Head Teacher/Manager considers whether this could create a conflict of interest in the light of information known to the school on the employee’s Declaration of Interests and other employment form or otherwise and shall make suitable enquiries to assess whether this is the case.
- Ensure that employees review and update their declaration form if necessary, every two years.
- Take appropriate disciplinary action where it is discovered that an employee has acted improperly and has failed to declare relevant information or has given false or misleading information.
- Where it is discovered that an employee or relevant person has benefited from a decision that the employee has made concerning a contract or any other issue in which the employee had an interest then the matter should normally be treated by the Head Teacher/Manager as a disciplinary offence in accordance with the school’s/trust’s Disciplinary Procedure and the Code of Conduct.
- Ensure that when making appointment decisions or procuring services for the School/Trust, that these appointments/services do not represent a conflict for the School/Trust or put the School/Trust at risk; such as an overlap of services which could lead to the blurring of professional lines e.g. a Clerk providing Legal or HR advice or being employed in another capacity within the school. The contract for such services should also reflect the requirement for contractors to undertake their services with due regard and in the spirit of the School’s/Trust’s Conflict of Interest Policy and Code of Conduct.
- Where a close personal relationship exists or develops that may lead to allegations of favouritism or special treatment the member of staff must declare it.
- If a close personal relationship develops between the Head Teacher/Manager and an employee, or between any other Head Teacher/Manager and an employee, the Head Teacher/Manager will draw the relationship to the attention of the next senior leader in the School/Trust who will:
  - meet the parties to discuss –

- any actions that can be taken by the employees voluntarily to avoid repercussions e.g. looking for redeployment opportunities, seeking other employment outside the school (an appropriate time deadline should be set)
  - actions that can be taken by the Head Teacher/Manager e.g. alternative supervision/line management arrangements for issues involving a potential conflict of interest (matters related to pay, job opportunity and disciplinary/sickness/capability issues).
- consider the operational difficulties that may arise as a result of the relationship and how these might be managed e.g. in relation to finance and procurement rules as well as other matters.
  - consider if it is appropriate to communicate such agreed adjustments to other colleagues in the team/workplace to manage any concerns.
  - consider what action should be taken where neither party are prepared nor able to agree the course of action to resolve the matter e.g. disciplinary action.

## **Employees Responsibilities**

Employees have a responsibility to:

- Discuss with their Head Teacher/Manager any external interests of themselves or a relevant person which could be in actual or apparent conflict with the School's/Trust's interests or with their duties working for the School/Trust as soon as they become aware of this. Where an actual conflict is discovered, employees will be required to avoid or cease to continue that interest and may be required to resign from their external interest or their employment with the School/Trust. Completion of a Declaration of Interests form does not in itself represent the approval by the School/Trust of an employee's relationships or interests.
- When assigned a new task or role, the employee should consider whether this could create a conflict of interest in light of external interests. Similarly, where the employee's personal circumstances change or their other employment or business or other interests change they need to discuss these changes with their Head Teacher/Manager and make adjustments to their Declaration of Interest form if necessary.
- Where the employee is aware that a relative wishes to involve themselves in a contractual relationship with the School/Trust, this should be declared to the Head Teacher/Manager.

Employees shall:

- Not engage in private work where this may impact on your role with the School/Trust i.e. business or an appointment outside the school/trust (paid or unpaid) e.g. tutoring / coaching or babysitting or other services for parent of pupils at the School/Trust. If

you have any doubt you should discuss any private work and its potential impact on the school with your line manager or Head Teacher.

- Not participate in or seek to influence any decision concerning the interests, services, property or other contracts of themselves or a relevant person.
- Not involve themselves in decisions relating to the appointment/recruitment (including contracting via an agency, self-employment, or consultancy), discipline, grievance, redundancy or other processes relating to a relevant person. Where employees are involved in the recruitment process of a 'relevant person', the nature of the relationship should be declared beforehand in order that this can be assessed as to whether a significant conflict exists. Advice should be sought from the School's HR adviser in this regard.
- Not involve themselves in any investigation or inquiry relating to a relevant person unless authorised to do so by the employee's Head Teacher/Manager required to do so by law or by any school/trust appointed investigator or lawyer.
- Declare to their Head Teacher/Manager any personal relationship which develops with another Head Teacher/Manager or person who is or seeking to become or may become the employees Head Teacher/Manager through a promotion or recruitment process.
- Not pursue their public and private interests in a manner which is likely to bring the School/Trust into disrepute.
- Comply with the local standards of conduct or instructions set out or given by the School/Trust.
- Update their Declaration of Interest form within 28 days of a change in their interests occurring and shall complete a new form (where you are required to complete a form) every two years.

**Failure to disclose an interest, providing an incomplete or inaccurate disclosure, failing to seek approval or failing to appropriately manage a Conflict of Interest may constitute misconduct or a breach of terms and conditions of employment and may result in disciplinary action being taken by the School/Trust.**

**Employees should note that criminal sanctions may apply where an abuse of position has occurred or where an employee or a relevant person has gained a pecuniary advantage. Employees should note that contravention of any of the above could lead to disciplinary action being taken against them.**

### **Exceptions**

- Trade Union or whistle-blowing activities are excluded from this.

## **Managing Conflict of Interest Situations**

### **Identifying Conflicts of Interest**

The employee concerned will always have the fullest knowledge of their own affairs, and will usually be in the best position to realise whether and when something at work has a connection with another interest of theirs or relevant person. However, Head

Teachers/Managers should remain generally alert for issues affecting other people that may create a problem.

Whilst it is primarily the duty of the individual to declare all interests, others, such as a manager, colleague or other members of the School/Trust community may become aware of the conflict of an actual, potential or perceived conflict of interest and should request that the individual declares their interests so that they can be managed appropriately.

The following questions may help in deciding whether a conflict of interest exists:

- Could there be benefits for the employee in the future that could cast doubt on their objectivity?
- Would colleagues or the public be concerned with the association if they became aware of it?
- Would a fair and reasonable person perceive that the employee was influenced by a personal interest in performing their duty?
- Is it reasonable to think they need to seek advice or discuss the matter with an objective party?
- Would the employee be able to act impartially and, in the school's/trust's public interest?
- Is the employee a member of an association, club or professional organisation (not Trade Unions), or do they have particular ties and affiliations with organisations or individuals, who stand to gain or lose from the School's/Trust's consideration of the matter?

### **Taking Further Action**

All declared actual, potential or perceived conflicts of interests should be reviewed by the Head teacher (or Chair of Governors/Trustees where the declaration relates to the Head teacher).

If a potential conflict of interest has been identified, further steps may be required to remove any possibility or perception the employee's position is being used for private benefit.

Deciding on what further action to take is a question of risk management for the school/trust and will largely be informed by the judgement about the potential impact on the public's confidence, and the seriousness of the harm or wrong likely to result from such influence or its appearance.

Factors to take in consideration when assessing the seriousness of the conflict of interest and therefore the appropriate mitigating action include:

- the type or size of the employee's other interest.
- the seriousness of the actual, potential or perceived conflict.
- how closely the two interests are related to each other.
- the nature or significance of the particular decision or activity being carried out by the school.
- the extent to which the employee's other interest could specifically affect, or be affected by, the school's decision or activity.

- the nature or extent of the employee's current or intended involvement in the school's decision or activity.
- the employee's role and level of responsibility within the school; and
- if the employee holds delegated financial responsibility.

Failure to complete a Conflict of Interest Declaration Form; revise it if circumstances change; and submission of a declaration form which has been deliberately completed in an incorrect or misleading way shall constitute a disciplinary offence and may result in the following:

- a) An explanation of the policy and retraining by the relevant Manager; and/or
- b) Disciplinary action, up to and including dismissal from employment.

Note: Although it is the employee's responsibility to disclose actual or apparent conflict with the School's/Trust's interests, before deciding on the appropriate mitigating action the Head teacher/Manager should first consider whether the employee has been made reasonably aware of their responsibilities regarding conflict of interest disclosure.

Instances of corrupt conduct can lead to dismissal and/or criminal prosecution.

School leaders should seek advice from their HR provider in exceptional circumstances that are less straightforward.

## **Potential Outcomes**

### **No Conflict Exists:**

- Where the Head teacher / Chair of Governor/Trustee (or nominated governor/trustee) determines that there is no conflict of interest, this should be formally recorded in the employee's personal file. An explanation and any supporting documentation should be included as to why it was concluded that no conflict arose.
- In the instance that the overlap of two or more interests is so slight that it does not constitute a real conflict of interest, for example, where the connection between the interests is remote or insignificant, then it may be determined that such interests do not represent a conflict.

### **Conflict Does Exist:**

- Once a conflict of interest is deemed to exist the Head teacher / Chair of Governor/Trustee (or nominated Governor/Trustee) will determine the appropriate resolution. These may include:
  - **Continue:** be permitted to continue, where the conflict is considered to be insignificant. In such circumstances, there will be an ongoing onus on the employee to ensure in carrying out such interest(s), there is no perception/suggestion that this interest is connected or affiliated with the School's/Trust's business. The employee shall ensure that in carrying out

- such interest(s) they do nothing to bring the School/Trust into disrepute, or impact upon their ability to discharge their responsibilities effectively;
- **Continue with restrictions or additional oversight:** additional oversight or review over their activity in relation to their role within the School/Trust and involvement in the area of identified conflict;
  - **Withdraw:** for the individual to withdraw from any discussions in relation to the particular area of conflict or from making any decisions in relation to the particular area of conflict;
  - **Reassign or redeployment:** refer the decision, tasks or duties to others and/or redeploy individual to other role within the School/Trust;
  - **Relinquish:** for the employee to stand aside/down from any involvement in the particular area of identified conflict.
  - **Disciplinary action:** Where the employee refuses to relinquish their involvement in the particular area of identified conflict resulting in the School/Trust's interests being compromised (real or perceived)

School leaders should seek advice from their HR provider where it is unclear/possible conflict of interest exists and/or the circumstances are less straightforward.

## **Data Protection**

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998, and subsequent data protection legislation.

## **Storage and Disposal of Data**

The completed forms shall be retained on the employee's personal file.

The Declarations of Interest forms of former employees will be held by the School for a minimum of 2 years after an employee leaves the school's employment.

Disclosure information must be destroyed by secure means, i.e. shredding.

## **Policies to be considered in relation to the Conflict of Interest Policy**

Code of Conduct

Disciplinary Policy and Procedure

Whistleblowing Policy

School/Trust Code of Conduct for Governors (for ex-officio and staff governors).

**School's/Trust's Declaration of Interests Form – Guidance Notes**

**Note: Where the conflict relates to the Head teacher, the Chair of Governors or nominated governor will be required to consider the Declaration of Interests Form.**

1. All employees are required to complete Parts 1, 2 and 3 of the Declaration of Interests form found at Appendix A.
2. Parts 1 and 2 employees must give their personal details and details of any other employment held within or outside of the school.
3. Part 3 employees must declare whether they (or their spouse or partner or any business or company owned by them or their spouse or partner) own land, buildings or other property within or outside the borough which they lease or rent (or intend to lease or rent) or are about to sell that property to the Governing Body/Trust or to Brent Council or faith body if Voluntary Aided.

Employees will also need to complete this section to state whether they (or their spouse or partner) have a contract or agreement (or are about to enter into a contract or agreement) with the School/Trust or Brent Council or faith body if Voluntary Aided.

Employees shall also register any such interests belonging to their spouse or partner and any business owned by them or their spouse or partner and any such interest belonging to any other Relevant Person if known to them.

4. Employees are required to consider whether the other parts of the Declaration of Interest Form apply to them and, if so, to complete it as required.
5. Employees should complete the form accurately and honestly and return it to their Head Teacher/Manager as soon as possible after taking up employment with the school or taking up a new position with the school.
6. Measures should be put in place to ensure confidentiality is maintained at all times.
7. Employees are required to put in writing and discuss with their Head Teacher/Manager as and when they arise any external interest(s) which is or could potentially be in conflict with their responsibilities at work or with the School's/Trust's overall interests.
8. Prior to engaging in any other business or taking up additional employment, employees should disclose this in writing to their Headteacher/Manager, unless this is specified in their contract.

Permission will normally be withheld where there would or could be a conflict of interest or an adverse impact on the service provided by the employee to the School/Trust. The Head Teacher/Manager may wish to grant permission subject to reasonable conditions. If permission is given the details of the other business, involvement, employment or work which has been so authorised and any conditions imposed by the Head Teacher/Manager shall be included in the relevant part of the Declaration of Interest Form. Any such permission and any conditions attached to it may only be given if endorsed by the Board of Governors/Trustees, or an appropriate committee as delegated by the Board of Governors/Trustees.

10. If a Head teacher/Manager wishes to withdraw permission at any time then he or she must refer the matter to the Board of Governors/Trustees, who will consider the recommendation. HR and/or Legal advice should be sought before withdrawing permission as there may be contractual implications from such a decision.

## **APPENDIX B**

### **School's/Trust's Declaration of Interests Form**

Conflict of Interest Policy for Schools  
Author: Brent Schools HR Service  
Revised: December 2024

**NAME** .....

The public is entitled to demand conduct of the highest standard from employees of the school/trust. School/Trust employees have an obligation to avoid conflicts between their private interests and their duty to the School/Trust, particularly where this could react detrimentally to the school's/trust's interests, or in any way weaken public confidence in the conduct of the school's/trust's business.

This declaration of interests by each employee enables the school and its employees to avoid unjustified suspicions about individuals' influences and motives. It also provides a publicly recognised system for better maintaining proper standards of conduct and ensuring that there is no impropriety in the School's/Trust's internal and external dealings.

In this form a "relevant person" means a spouse, partner, friend, relative, business or business associate.

**Instructions**

**Please print clearly in black ink/type as this form may be photocopied.**

**Parts 1, 2, 3 and the declaration at the end of the document must be completed by all employees.**

**Other parts of the form must be completed by all relevant employees – please see below for guidance on who is covered.**

**Failure to disclose an interest, providing an incomplete or inaccurate disclosure, failing to seek approval may constitute misconduct or a breach of terms and conditions of employment and may result in disciplinary action being taken by the School/Trust. If you are unsure how to complete the form please speak to your Head Teacher/Manager.**

**Part 1 – Personal details** (to be completed by all employees)

Forename:..... Middle Names: .....

Surname: ..... Date of Birth: .....

Are you known by any other name(s)?

If so please declare it here: .....

.....

Home address: .....

.....

.....

Details of any temporary address:

.....

.....

.....

Job Title/s: ..... Department: .....

Head Teacher/Manager.....

**Part 2 - Secondary employment (to be completed by all employees)**

**Employees must give their personal details and details of any other employment held within or outside of the School/Trust.**

Other than your employment with the school, do you have any other employment, self employment, company directorship or do you operate any other business or work in any other capacity either voluntarily or for financial gain?

Yes / No

If yes please provide details i.e. name and address of employer/business, nature of business etc.

Name of employer/business.....

Address of employer/business:

.....  
.....  
.....

Nature of business.....

.....

Nature of your employment  
or involvement in the business .....

Number of days and hours worked per week .....

The work is            Paid             Unpaid

.....

**If approval has been granted then you must notify your Head Teacher/Manager of any variations in these arrangements including changes in hours, company name, location, etc**

**Part 3 – Property transactions and contracts with Governing/Trust Board**  
(to be completed by all employees)

**Property**

Please specify below any land, buildings or other property owned by you, your spouse or partner or any business or company owned by you or your spouse or partner within or outside Brent which you or they lease or rent (or intend to lease or rent) to the Governing/Trust Board or Brent Council or faith body if Voluntary Aided and any property you are about to sell to the Governing/Trust Board or Brent Council or faith body if Voluntary Aided.

.....

.....

.....

.Please specify below any land, building or other property owned by any other Relevant Person within or outside the borough which you know is leased or rented (or is intended to be leased or rented to the Governing/Trust Board or Brent Council or faith body if Voluntary Aided and any property they are about to sell to the Governing/Trust Board or Brent Council or faith body if Voluntary Aided.

.....

.....

.....

**Contracts**

Please specify here any contract or agreement you or your spouse, partner or any business or company owned by you or your spouse or partner have entered into or are about to enter into within the Governing/Trust Board or Brent Council or faith body if Voluntary Aided.

.....

Please specify here any contract or agreement which you know has been entered into between any other Relevant Person and the Governing/Trust Board or Brent Council or faith body if Voluntary Aided or which you know is about to be entered into.

.....

.....

.....

**Part 4 – Other Property and contracts (specified officers)**

This part of the form only applies to employees who are responsible for:

- making decisions about the infrastructure or development of the School/Trust or borough
- assessing claims or grant applications in respect of properties in the borough
- collecting monies from property owners or leaseholders in the borough
- determining applications for planning permission or building control approvals or alcohol and entertainment licenses or any other permissions, consent, licences, approvals, notices or similar decisions
- carrying out functions which may affect property values in the borough
- enforcement duties or who carry out investigations in relation to properties in the borough.

Please specify here whether you or your spouse or partner or any business or company owned by you or your spouse or partner have any beneficial interest in any property in the borough, including any leasehold or freehold interest, owned either solely or jointly, and whether directly or via company ownership and, if so, please give the address(s).

.....  
.....  
.....

Please specify here whether you are aware of any other Relevant Person has any beneficial interest in any property in the borough, including any leasehold or freehold interest, owned either solely or jointly, and whether directly or via company ownership and, if so, please give the address(s).

**Part 5 – Business ownership (specified officers)**

This part of the form only applies to the following categories of staff i.e. those who are responsible for:

- any procurement or purchasing decision, including staff who make recommendations as to the use of any particular supplier of goods, services or works.
- any action or decisions regarding enforcement action or income collection in relation to businesses in the school / borough.

This Part also applies to chief officers, deputy chief officers, assistant directors, unit directors, Head Teachers and any other person who manages or is otherwise responsible for any of the above-mentioned categories of staff.

Do you, your partner or spouse or any business or company owned by you, your spouse or partner have any beneficial interest including directorship, shareholding (over 5%), profit share arrangement or ownership, in any limited or non-limited company, partnership, small business or trade providing services, goods or works.

Yes / No

If so please list the entities, including name, trading name, full address and nature of business and the nature of your/ your partner etc interest in them

.....  
.....  
.....  
.....

Are you aware of any beneficial interest including directorship, shareholding, profit share arrangement or ownership held by any other Relevant Person in any limited or non-limited company, partnership, small business or trade providing services, goods or works.

Yes / No

If so please list the entities, including name, trading name, full address and nature of business and the nature of your/ your partner etc interest in them

**Part 6 - Recruitment**

For all staff involved in recruitment of staff at the school, including selection of agency workers, please answer the following question:

Are you a member of a select society such as the freemasons, mechanics, buffaloes, catenians, knights of St Columba, soroptimist club.

Yes / No

Please detail any memberships below including the name and meeting place of the branch / chapter etc.

.....  
.....  
.....

**Part 7 - Charities / Voluntary Organisations / Clubs**

For all staff involved in awarding grants, permissions or relief to Charitable or Voluntary organisations or Clubs within Brent and chief officers, deputy chief officers, assistant directors, Head Teachers/Managers and any other person who manages or is otherwise responsible for any of the above mentioned categories of staff, please answer the following question:

Are you a member of a charity, voluntary organisation or club within Brent which may benefit from a grant, permission or relief provided by the school?

Yes / No

If yes, please provide details of the organisation, its address and your position.

.....  
.....  
.....  
.....

**Part 8 – Schools**

For staff involved in any decision making concerning the allocation of resources, either capital or revenue to Brent schools, please answer the following questions:

Are you a member of a governing body, Schools Forum or Parent Teacher Association (PTA) at a school in Brent or have a child who attends a Brent school.

Yes / No

If yes, which one, and what is your position.

.....

.....  
.....  
**Declaration** (to be completed by all employees)

**I declare that to the best of my knowledge and belief the answers on this form are truthful, accurate and complete. I understand that giving false information on this form or failing to give the information or failing to give it accurately or failing to update it within 28 days of a change occurring may result in disciplinary action being taken against me.**

**I undertake to inform my Head teacher/Manager of any changes to my personal interests within 28 days of that change taking place.**

**Signed \_\_\_\_\_ Date \_\_\_\_\_**

**When completed, please return this form to your Head Teacher/Manager/Chair of Governors/Trustees**

**Head Teacher/Manager/Chair of Governors/Trustees Declaration**

- I have reviewed this form. It is my firm belief that there are no interests which appear to be in conflict with the responsibilities of the post.**
  
- There are such interests and these have been discussed and appropriate action has been taken in accordance with the potential outcomes set out in this policy, and is recorded accordingly on the personnel file.**

**Signed ..... Name .....**

**Title ..... Date .....**