



*"Excellent Learning, Teaching and Leadership for All"*

## Business Dealings with Personal Associates and Declarations of Interest Policy

## 1. Introduction

Windsor Learning Partnership's [Anti-Fraud and Anti-Corruption Guidance for Employees](#) refers to the organisation's policies on business dealings with personal associates and declarations of interest. The aim of these policies is to help prevent and identify fraud and corruption.

## 2. Business Dealings with Personal Associates

2.1 Situations may arise where an School within the Windsor Learning Partnership has business dealings or the potential for a business contact with someone who is a friend, neighbour or acquaintance of an employee of the organisation. In such cases, Windsor Learning Partnership must ensure that any business is conducted in accordance with its standing orders and other regulations, so that no criticism can be made of the way the organisation's business is conducted.

2.2 Staff are required to abide by the following requirements:

- If you introduce friends or acquaintances for business purposes or you are approached by a friend or acquaintance regarding business with the organisation, you must not take part in the decision-making process.
- If in relation to your professional role, a potential business relationship develops with a friend or acquaintance, you must advise your Headteacher immediately. Further to this you must take no active part in the matter either privately and/or in your professional capacity as a Windsor Learning Partnership employee.
- These rules also apply where you are introducing someone as a potential business contact to a colleague either in your own school or in another school within the Trust.
- These rules are aimed at protecting the reputation of staff and the organisation.

## 3. Declarations of Interest

3.1 Staff must make a written declaration of any direct or indirect pecuniary (i.e. financial) interest they have in a potential contract to be conducted by Windsor Learning Partnership. A direct pecuniary interest includes any financial advantage or disadvantage involving a gain or loss for the employee.

An indirect pecuniary interest occurs where:

- i. the officer or any nominee of his/her is a member of a company or other body with which the contract was made or is proposed to be made; or
- ii. the officer is a partner or in the employment of the person with whom the contract was made or is proposed to be made.

In the case of a couple living together, the interest of one partner if known to the other shall be an interest of the other.

An employee is forbidden in his / her employment, to exact or accept fees and/or rewards other than his / her appropriate remuneration.

In addition, the requirement also relates to actual or potential interests of spouses.

Declarations of interest in a contract should be made to your Headteacher. Refer to the [Anti-Fraud and Anti-Corruption Guidance for Employees](#) and the [Declaration of Interest Form](#). In such cases you should not take any part in the process. Acceptance of a reward or failure to register an interest is a criminal offence and is punishable by a fine of up to £1000.

3.2 If you are in any doubt about whether a particular situation is covered by either of these two provisions, you should discuss the matter with your Headteacher.

3.3 You must declare to your Headteacher, membership of any organisation that falls within the following definition:

'Any lodge, chapter, society, trust or regular gathering or meeting, which:

- (a) is not open to members of the public who are not members of that lodge, chapter, society or trust;
- (b) includes in the grant of membership an obligation on the part of the member a requirement to make a commitment (whether by oath or otherwise) of allegiance to the lodge, chapter, society, gathering or meeting;
- (c) includes, whether initially or subsequently, a commitment (whether by oath or otherwise) of secrecy about the rules, membership or conduct of the lodge, chapter, society, trust, gathering or meeting.'

A lodge, chapter, society, trust, gathering or meeting as defined above, should not be regarded as a secret society if it forms part of the activity of a generally recognised religion.

3.4 In addition to the above, employees should again advise your Headteacher of their membership of any such organisation where in a specific instance such membership constitutes (or can be perceived as) a conflict of interest.

Signed: \_\_\_\_\_ Date: 06 October 2016

Chair of the Board of Trustees

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<b><i>Reviewed on</i></b>	
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