



Governance Declarations of Interests Policy

This policy applies to all academies within Bonitas Multi-Academy Trust

Date last reviewed	Autumn 1 2025
Review period	Two years
Date of next review	Autumn 1 2027
Owner	Governance Professional
Approved by	Board of Trustees
Date approved	15 May 2024
Associated documents/information	<ul style="list-style-type: none">• Academy Trust Handbook• Bonitas Governance Code of Conduct

Declaration of Interests Policy & Guidance

1. Purpose

The Trust is required under the Academy Trust Handbook (ATH), its Funding Agreement, and charity law to ensure that all decisions are taken solely in the best interests of the Trust and its pupils. To support this, the Trust maintains a comprehensive Register of Interests and requires all individuals in governance and leadership roles to declare any relevant interests. These requirements operate alongside statutory duties under the Companies Act 2006 (including directors' duties) and the Trust's Articles of Association (which set out rules on managing conflicts and withdrawal from decision-making).

This policy sets out:

- what must be declared;
- who must declare;
- how declarations are recorded and managed; and
- the consequences of failing to declare.

2. Scope

This policy applies to:

- Members of the Trust;
- Trustees and any non-trustee members of Board committees/panels;
- Local governors and any non-governor members of local governing body committees, working parties and panels;
- Senior employees of the Trust (defined as the Accounting Officer, Chief Financial Officer, headteachers/principals, and any staff who have influence over financial decisions).

3. What Must Be Declared

In line with ATH, the Register must include business and financial interests as well as governance roles in other educational institutions.

Failing to declare an interest may constitute a breach of this policy and of the Trust's Code of Conduct. Trustees and governors are also bound by the Nolan Principles of Public Life. If in doubt, the interest should be included.

Breaches may result in removal from office in accordance with the Trust's Articles of Association.

Individuals must declare the following for themselves, and where relevant, for close family members or close connections:

3.1 Business and Financial Interests

- Any employment, self-employment, directorships, partnerships or trusteeships in businesses, charities or organisations that provide goods or services to the Trust.
- Any company in which you, separately or together with close family, hold more than 20% of the shares or voting rights.
- Any payments (excluding reimbursement of expenses) received from organisations connected with the Trust.

- Any investments, trusts or financial arrangements that may be affected by Trust decisions.
- Any gifts or hospitality received in the last 12 months connected with Trust business.

3.2 Governance and Other Roles

- Trusteeships, governorships or directorships in other educational institutions, charities or organisations relevant to the Trust's functions.
- Employment or elected membership with a local authority linked to the Trust.
- Any office-holder role in a local authority or in a company controlled by a local authority.

3.3 Personal and Family/Close Connections

- Close family or close personal connections employed by the Trust, or holding governance or leadership positions within the Trust.
- Close family connections who are parents, carers or guardians of pupils in the Trust.
- Any relationship that could reasonably be perceived by the public as creating a conflict of interest.

4. Definitions

- **Business interest:** involvement in a trade or profession, or direct interest in a company or body providing goods or services to the Trust.
- **Pecuniary interest:** a financial interest that may result in personal financial benefit (direct or indirect).
- **Personal interest:** where the matter affects the well-being or circumstances of you, your family, or close associates beyond that of the wider community.
- **Prejudicial interest:** where a personal interest is so significant it could reasonably be seen to impair objectivity.
- **Close relative:** parent, sibling, child, spouse, civil partner, or member of the same household.

5. Declaring Interests

- **On appointment:** all relevant individuals must complete a declaration form before their first meeting.
- **Annually:** declarations must be renewed at the start of each academic year.
- **Ongoing:** any new interests must be declared within 28 days of arising.
- **At meetings:** individuals must declare relevant interests at the start of a meeting or as soon as they are aware of the issue being discussed.

Where a **prejudicial interest** exists, the individual must withdraw from discussion and decision-making.

6. The Register of Interests

The Register will include:

- Full name;
- Appointment date, term of office, and (where relevant) date of stepping down;
- Appointing body;

- Relevant business and pecuniary interests;
- Governance roles in other educational institutions;
- Close family or personal connections, where relevant.

The Register will be maintained by the Governance Professional to the Trust and updated promptly when new declarations are made.

7. Publication

In line with ATH requirements:

- The Trust will publish on its website the relevant business and pecuniary interests of Members, Trustees, local governors, and senior employees.
- Sensitive information may be withheld where publication would present a serious risk of violence or intimidation. Such cases must be agreed with the Governance Professional and Chair of Trustees.
- The Trust will record in meeting minutes:
 - Nature of the conflict
 - Who it related to
 - Whether declared in advance or verbally
 - Discussion summary
 - Whether the individual withdrew
 - How the decision was made in the Trust's best interest
- The Trust will make agendas, approved minutes, and reports from meetings accessible on request.
- All contracts or agreements with related parties will be handled with integrity, fairness, and transparency, demonstrating value for money, and not giving preferential treatment. Contracts over £40,000 (or cumulative contracts with the same related party exceeding £20,000 in a financial year) require prior DfE (previously ESFA) approval. The Trust will report all related party transactions in its annual accounts, regardless of value.