Prime 7
Multi Academy Trust

Conflicts of Interest Policy

CEO Approval: March 2026

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Appendices

1. Policy Statement

1.1 This Policy is subject to the published Equality Information, in line with the Equality Duty 2011, Companies Act 2006, the Academy Trust Handbook and is underpinned by the values of our Multi Academy Trust.

2. Background

2.1 It is important that Prime7 Trust (the Trust) and its academies not only act impartially but are also seen to act impartially.

2.2 We all have a responsibility to avoid any conflict between our business and personal interests and affairs and those of the Trust and / or the academy where we work.

2.3 There is a legal duty on all of us to declare an interest likely to lead to questions of bias when considering any item of business at a meeting and for us to withdraw, if necessary, whilst the matter is considered. In declaring any interests, we have, we are protecting ourselves from any false accusation of bias or corruption.

2.4 In line with the mandatory guidance in the latest version of the DfE Academy Trust Handbook it is the Trust's policy to establish and maintain a register of interests which must capture relevant business and pecuniary interests of all Members, Directors, governors and senior employees within the Trust (this includes Headteachers and any other member of staff with authorisation to raise and / or approve a purchase order and/or contract). including:

- directorships, partnerships and employments with businesses
- 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.

2.5 To avoid repetition within this document, the phrase 'Relevant Individuals' is used to include all Members, Directors, governors and senior employees within the Trust (including Headteachers and any other member of staff with authorisation to raise and/or approve a purchase order and /or contract).

2.6 The register will enable Relevant Individuals to demonstrate that in spending public money they do not benefit personally from the decisions that they make.

2.7 The maintenance of the register does not remove the requirement upon any individual to disclose orally any interest at any specific meeting and, if appropriate, to leave the meeting for that agenda item.

2.8 Pecuniary interest is a wider term than business interests and includes, if appropriate, the company by whom they are employed, directorships, significant shareholdings or other appointments of influence within a business or other organisation which may have dealings with the Trust or its academies. They should include their own interest and those of any member of their immediate family (including partners) or other individuals known to them who may exert influence. For these purposes the following persons are connected:

- A relative of the Relevant Individual. A relative is defined as a close member of the family, or member of the same household, who may be expected to influence, or be influenced by, the person. This includes, but may not be limited to, a child, parent, spouse or civil partner

- An individual or organisation carrying on business in partnership with the Relevant Individual or a relative of the Relevant Individual

- A company in which a Relevant Individual or the relative of a Relevant Individual (taken separately or together), holds more than 20% of the share capital or is entitled to exercise more than 20% of the voting power at any general meeting of that company

- An organisation, which is controlled by a Relevant Individual or the relative of a Relevant Individual (acting separately or together). For these purposes an organisation is controlled by an individual or organisation if that individual or organisation is able to secure that the affairs of the body are conducted in accordance with the individual's or organisation's wishes

  Due to the nature of pecuniary interests, they cannot only be declared annually. All Relevant Individuals should be made aware at Board meetings, committee meetings or Local Governing Board meetings, as appropriate, of the need to declare these interests as they arise.
  Declarations should be made in writing to the Chair of the relevant board/committee and should be filed in a register of pecuniary interests.

3. Maintaining the Register

3.1 Declarations are completed on GovernorHub in the first term and the data collated by the Business Manager/CFO for reporting purposes. Guidance is provided as per Appendix A & B

3.2 The register will be held in the Trust's Business Manager/CFO's office and the Governance Professional and Trust's Business Manager/CFO will take lead responsibility for ensuring all Relevant Individuals are identified and the interests registered.

3.3 It is the individual's responsibility to notify the Business Manager/CFO of any relevant changes in their circumstances. Additionally, all individuals will be required to confirm the accuracy of the register entry annually.

APPENDIX A

Guidance notes

Members/Directors/Committee members, Local Governing Board LGB Governors and the Central Executive Team have a legal duty to act only in the best interests of the Academy Trust (Academy). Where a situation arises in which they cannot do this due to a personal interest they have, steps should be taken to identify, prevent and record the conflict. This ensures they are acting in the best interests of the Academy Trust

In the declaration above, you must provide details relating to:

- Your ownership or partnership of a company or organisation, which may be used by the Trust/Academy to provide goods or services.
- Goods or services you offer which may be used by the Trust/Academy.
- Any close relation you have to someone who satisfies either of the above.
- Any close relationship you have to someone who is employed by the Trust/Academy.

Declaring your conflicts of interest is a legal requirement within the Articles of Association and Academy Trust Handbook. However, making an annual declaration does not remove your requirement to make an oral disclosure of the interest and temporarily leave the meeting, where the interest is relevant to something being discussed.

Pecuniary interests

Generally, Members/Directors/Committee members, Governors and the Central Executive Team (CET) should not participate in any discussions in which they may directly or indirectly benefit from a pecuniary interest, except where the relevant authority has authorised this
i.e. Articles of Association. A direct benefit refers to any personal financial benefit, and an indirect benefit refers to any financial benefit you may have by virtue of a relationship to someone who stands to gain from a decision of the Members/Board/CET or LGB. Both direct and indirect interests must be declared.

Non-pecuniary interests (Conflicts of loyalty)

There may be a non-pecuniary interest whereby the person does not stand to gain any benefit, but a declaration should still be made. For example, this might be where a person required to declare an interest has a family member working in the Academy/Trust. While the individual might not benefit personally, their judgment could be impaired if something were brought up that would affect the family member.

Handling the conflict

The board must make a decision as to whether or not they should take steps to remove the conflict by:

- Not pursuing the course of action, it relates to; or
- Proceeding with it in an alternative way which does not give rise to conflict; or
- Not appointing the Member/Director/Governor/Committee member in question or seeking to secure their resignation.

In the minutes of the relevant meeting, the following should be recorded:

- The nature of the conflict.
- To whom it relates.
- Whether a declaration was made in advance of the meeting.
- A brief overview of what was discussed.
- Whether the director(s)/committee member withdrew from the meeting.

- How the Members/Directors/Committee members, Local Governing Board (LGB) Governors/Central Executive Team (CET) made the decision in the best interests of the Trust/ Academy.
- Whether there is a related party transaction and whether it requires prior approval from the DfE. The latest DfE guidance on Related Party Transactions will be followed at all times.

Review of Register

The register should be reviewed annually by the governance professional to the Board/Committee but any new interest or ceased interest, should be reported to the governance professional as and when they occur. Upon completion, this signed form should be given to the governance professional of governors whose responsibility it is to keep a register of all interests and review itannually.

The Charity Commission has produced guidance on dealing with conflicts of interests if further information is required,

APPENDIX B
FOR GUIDANCE, A SUMMARY OF THE RELEVANT PART OF THE REGULATIONS ABOUT WITHDRAWAL FROM MEETINGS AND DISCLOSURE OF INTEREST ARE SET OUT BELOW.

WITHDRAWAL FROM MEETINGS - HAVING AN INTEREST

The general principle is that no-one should be involved in a decision where his or her personal interests may conflict with those of the Trust or Academy.

- The regulations apply to all Relevant Individuals.
- The Governance Professional to the Board shall be required to withdraw when the Board is discussing the Governance Professional's pay/contract or disciplinary action against the Governance Professional.
- Members, Directors and Governors have to withdraw when their own appointment, reappointment or removal as a member of the Board / local governing board or a committee is under consideration.
- Any person who is employed to work at the Trust (other than the CEO, CFO or Headteacher, as appropriate), must withdraw from a meeting where the pay or performance appraisal of any particular person employed to work at the Trust is under discussion.
- The CEO, CFO or Headteacher, as appropriate, must withdraw from any meeting where his / her own pay or performance appraisal is under discussion.
- If a person has any pecuniary interest, direct or indirect in any contract, proposed contract or any other matter under discussion at a meeting she / he shall at the meeting disclose the fact and:
  a) withdraw from a meeting during the consideration or discussion of the meeting.
  b) not vote on any question with respect to that matter.
- A person has an indirect pecuniary interest if:
  a) She / he, or any nominee of hers / his, is a member of a company or other body with which a contract is under consideration or has been made.
  b) She / he is a partner in business or in the employment, of a person with whom the contract is made or under consideration.
- A person has a direct or indirect pecuniary interest in a matter if a relative (including a spouse) living with her / him, has a direct or indirect pecuniary interest.
- The Headteacher (whether a Member, Director, governor or not), a Member, Directors, Governor who is a teacher or member of the non-teaching staff, or any teacher who is in attendance in an advisory capacity should not have an interest that is greater than the interest of the generality of teachers at the academy.
- A person present at a meeting of a selection panel at which the subject for consideration is that person's appointment (or that of his / her relative or spouse) to a post as a teacher or otherwise within the Trust, a transfer or promotion or retirement or shall be a candidate for the resulting vacancy, she / he shall be deemed to have an interest.