

Pensby Primary School Conflict of Interest Policy

1. Policy Statement

The school is committed to the highest standards of ethical conduct and integrity in its business activities. This policy sets out the School's position if situations arise where school staff and governors at all levels have a conflict of interest in connection with their employment.

This policy applies to all school staff and Governors who are required to familiarise themselves and comply with this procedure, including any future updates that may be issued from time to time.

2. Background

The school is funded entirely from public funds through grants from central government. It is essential that the school can demonstrate the highest standards of probity in general, and specifically in relation to its dealings with third parties.

It is your responsibility to declare any **actual** or **potential** conflicts of interest. If you are in any doubt about whether an actual or potential conflict of interest exists, you should consult with the Head Teacher, Chair of Governors or the Local Authority. This will safeguard you from the possibility of future criticism, and allow the school management and governors to plan the work you are involved in accordingly to avoid actual or potential conflicts of interest arising which could impact negatively on the School and potentially result in disciplinary action up to and including dismissal being taken against you.

A conflict of interest can arise if your outside activities, private, personal or financial interests influence or interfere with the decisions you make in the course of your work for the school, or appear to or could be perceived to influence or interfere with the decisions you make in the course of your work for the school.

Within this context, outside activities, private, personal or financial interests include those that you or a family member or personal contacts may have.

These can include ownership of shares or a financial investment in a company or business, involvement in a company or business, or in a club or organisation, (whether these are open to the public or not) and include both employed and non employed roles and activities, including unpaid or voluntary positions within such organisations.

'Personal contacts' should be taken in its widest sense, and can include someone you play sport with, someone who is a member of the same club as you, or even a close personal relationship with a colleague.

A conflict of interest can also occur where you have access to school information and use, or could be perceived as using, this information for personal gain or advantage.

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and pass this information without authorisation to a family member, personal contact or an external organisation you are involved with, who then gain or could be perceived to gain an advantage or benefit by receiving this information.

You should not be involved in any employment matter including appointments or decisions relating to discipline, grievance, promotion or grading, or payment of additional expenses /overtime where you are related to an applicant or employee, or have a close personal relationship outside work with him or her.

Examples of Conflicts of Interest

Examples of conflict of interest include (but are not limited to):

- You are making a purchasing decision involving external suppliers/contractors and you, or a family member, or a personal contact has an interest (financial or otherwise) in one of the potential suppliers/contractors
- You are involved in voluntary work for a charity, which may benefit financially or otherwise be affected by a decision or recommendation that you are involved in making, in the course of your work for the school
- Work/involvement in business outside of the school, without permission to do So
- You have access to information at work which may assist or be perceived as assisting you in a private venture
- You use school systems / contacts to obtain materials for your own use at a preferential price
- You are involved in conducting a disciplinary investigation in which a person you have a personal relationship with is involved.

Head Teachers, governors and employees should seek advice from Human Resources if they are in any doubt about whether they have a conflict of interest. If the Head Teacher or Chair of Governors becomes aware of an actual or potential conflict of interest, which a member of staff or the governing body appears not to have raised, they should raise the matter with the employee or governor and take appropriate action.

If information comes to light regarding your outside activities, private or personal interests, and the school considers that you should have made a declaration but chose not to do so, or if you did not fully disclose details of any potential conflict of interest, then disciplinary action up to and including dismissal may be taken against you.

Secondary Employment

Employees at all levels are required to avoid getting into a position of conflict by undertaking outside work. It is considered that a conflict arises when an employee is to be paid by a member of the public or any outside organisation or body for work

which is in any way connected with the scope of his/her official duties. Such work should not be accepted.

3. Commitment to Equality

The following Equality Duties are addressed by this policy:

To advance equality of opportunity

To foster good relations between different groups of people

4. Procedures

There is a conflict of interest procedure to support this policy. Employees and governors are required to complete a declaration form on an annual basis.

The Head Teacher is required to maintain a conflict of interest register which should be presented to Governors on at least an annual basis.

5. Supporting Documentation

- Conflict of Interest Procedure
- Conflict of Interest Flowchart
- Conflict of Interest Declaration Form

6. Related Policies

- Gifts and Hospitality Policy
- Employee Code of Conduct

7. Communication and Awareness

This policy is considered:

Internal - For all staff and governing body members.

The Head Teacher will ensure that employees and governors are clear about the requirements of the Conflict of Interest policy. This should be discussed regularly at governing body and team meetings.