



**CONFLICT OF INTEREST POLICY
AND
PROCEDURE
FOR ALL SCHOOL STAFF**

Schools' Conflict of Interest Policy

The Governing Body of Stanley School adopted this Conflict of Interest Policy on 6th December 2016.

1. Policy Statement

The Governing Body 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 employees and managers at all levels have a conflict of interest in connection with their employment.

This policy applies to all employees of the School. All employees are required to familiarise themselves and comply with this procedure, including any future updates that may be issued from time to time by the School.

2. Background

Schools are funded almost entirely from public funds and it is essential that they 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 the Headteacher. This will safeguard you from the possibility of future criticism, and allow the Headteacher 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- 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's information and use, or could be perceived as using, this information for personal gain or advantage. It can also occur where you have access to School's information 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, a family member, or a personal contact own property, or intend to buy property, the value or purchase price of which may be affected by a decision or recommendation that you are involved in making, in the course of your work for the School.
- 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.

Headteacher and Employees should seek advice from Human Resources if they are in any doubt about whether they have a conflict of interest. If the Headteacher becomes aware of an actual or potential conflict of interest, which an employee appears not to have raised, they should raise the matter with the employee 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.

Procedures

There is a conflict of interest procedure to support this policy. Employees are required to complete a declaration form

Headteacher should ensure that employees are clear about the requirements of the Conflict of Interest Policy. This should be discussed regularly at Performance Appraisals, reviews and team meetings.

SCHOOL'S CONFLICT OF INTEREST PROCEDURE

Procedure

1.1 If you consider there may be a conflict of interest you should complete the Declaration Form – Conflict of Interest. The Declaration Form is available from the Headteacher and should be submitted to the Headteacher for consideration, or in the case of the Headteacher the form should be submitted to the Chair of Governors.

1.2 You will be notified in writing within 10 working days of any further proportionate actions you will be required to undertake regarding your conflict of interest.

1.3 There may be occasions where the conflict declared presents serious concerns about the employee's continued ability to perform the full range of their duties. In such circumstances, a meeting will be arranged to discuss the issue in detail with the Headteacher.

Appeals Procedure

1.4 If the Headteacher, and/or the Chair of Governors, confirms that they consider that there is a conflict of interest, the employee will have the right to an appeal to review the decision taken. The appeal should be considered by the school's Appeal Committee, please see Appendix A. The outcome of this appeal is final.

1.5 The School's Conflict of Interest procedure is set out in a flowchart (Appendix B).

2. Review of Approval

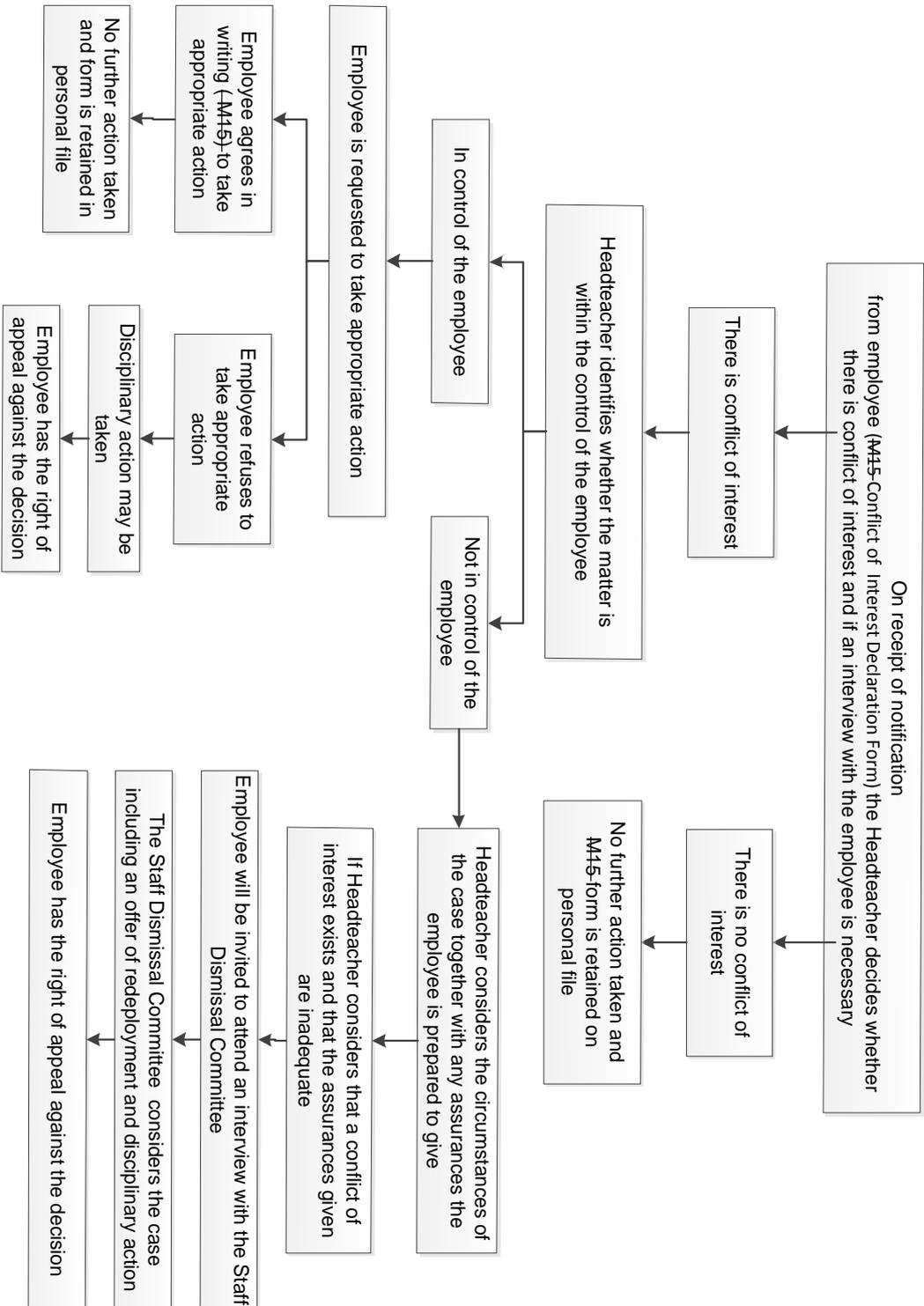
2.1 If there are any material changes which affect your declared conflict of interest in the interim period, this should be reported immediately to the Headteacher. This is the responsibility of the employee.

3. Monitoring and Compliance

3.1 Each Headteacher should maintain a register of conflict of interest declarations received and an annual return will be produced and reported to the Governing Body.

3.2 All completed forms will be placed on the employee's personal file

Conflict of Interest Flowchart



APPEALS PROCEDURE

Introduction

The employee has the right of appeal to the Schools Appeal Committee against any decision that there is a conflict of interest which could impact negatively on the School.

The appeal must be in writing and must include a copy of the Conflict of Interest Declaration Form and any further explanation for the reason for appealing the decision

All appeals should be submitted in writing to the Clerk to Governors within 5 working days of the decision.

Appeal Hearing

- i) The Headteacher or Chair of Governors to outline the reasons for the meeting.
- ii) The employee (or his/her representative) to put forward their case.
- iii) The members of the Schools Appeal Committee to ask questions of the Headteacher or Chair of Governors.
- iv) The Headteacher or Chair of Governors ask questions of the employee (or his/her representative).
- v) The members of the Schools Appeal Committee to ask questions of the employees (or his/her representative).
- vi) The Headteacher or Chair of Governors to sum up.
- vii) The employee (or his/her representative) to sum up.
- viii) Following the summing up, both parties, together with their representatives will withdraw.
- ix) The Chair of Governors may announce its decision to the Headteacher and/or the employee and his/her representative personally or subsequently in writing. Whichever method is chosen both parties should be informed in a like manner. A decision notified orally should be confirmed in writing by the Clerk to the Governors.
- x) The outcome of any appeal should be confirmed in writing with the employee within 10 working days of the appeal

