OUR LADY OF LOURDES

CATHOLIC MULTI-ACADEMY TRUST

Business Interests Policy

Title of policy:	Business Interests Policy
Author and policy owner in the Executive Team:	Daniel Moore – Chief Operating Officer
Reviewer:	Daniel Moore – Chief Operating Officer
Normal review frequency:	**Annual**
Version number:	**1.0**
Committee approval date:	**30th September 2026 – Finance and Estates Committee**
Trust Board approval date:	**14th October 2026**
Date of next review:	**October 2027**

Document review and editorial updates:			
Version control	**Date**	**Reason for Revision**	**Key revisions included**
2025/26 1.0	04/08/2026	Annual review	Replaced ESFA with DFE
2025/26 1.1			
2025/26 1.2			

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Our Mission Statement

We are a partnership of Catholic schools.

Our aim is to provide the very best Catholic education for all in our community and so improve life chances through spiritual, academic and social development.

By placing the person and teachings of Jesus Christ at the centre of all that we do, we will:
Follow the example of Our Lady of Lourdes by nurturing everyone in a spirit of compassion, service and healing
Work together so that we can all achieve our full potential, deepen our faith and realise our God-given talents
Make the world a better place, especially for the most vulnerable in our society, by doing ***'little things with great love'*** *St Thérèse of Lisieux*

Matthew 6:24 Good News Translation (GNT)

You cannot be a slave of two masters; you will hate one and love the other; you will be loyal to one and despise the other. You cannot serve both God and money.

Introduction

No Member, Director, Local Governor, employee or related individual should use their connection to the Trust for personal gain.

The Academies Trust Handbook states that "a trust must pay no more than 'at cost' for goods or services provided to it by the following persons:

- Any member or trustee of the academy trust
- Any individual or organisation related to a member or trustee of the academy trust
- Any individual or organisation given the right under the trust's articles of association to appoint a member or trustee of the academy trust"

To ensure the Trust can satisfy this 'at cost' requirement, it will maintain a register of business and pecuniary interests.

Duty to Declare

A Director, Local Governor, Headteacher or employee of the school, who can influence a decision of the Trust/school, and with a business interest in a personal capacity in any contract with the Trust/school, shall declare that interest in writing to the Trust. Such declaration shall be recorded in the register of business and pecuniary interests.

There is a requirement on any person who is present at a meeting of the Board or one of its committees (including meetings of the Local Governing Body) to declare a business interest direct or indirect. This relates to any contract, proposed contract or other matter that is being considered. The person must disclose the fact as soon as is practical at the meeting and must withdraw from the meeting during consideration or discussion of the contract or matter concerned. In addition, the person cannot vote on any question with respect to the contract or matter.

The Trust Governance Team issue annual declarations to relevant persons annual in Microsoft Forms format annually. In the event that this cannot be accessed, persons MUST complete a hard copy – attached at Appendix 2.

Annual declarations MUST be returned by Directors, Local Governors, Headteachers or employees of the school by the deadline of 30th September ahead of the Auditors Annual Review (however, the Trust should be informed of any changes to business interests as and when they occur throughout the year).

Register of Business Interests

The Trust should establish a register of business and pecuniary interests for the Directors, Local Governors and staff, which should be open to inspection.

It is important for anyone involved in spending public money to demonstrate that they do not benefit personally from decisions that they make. Therefore, Directors, Governors and staff should declare ALL business and pecuniary interests (regardless of whether there are/are not links to the School/Trust) including:

- Directorships, Partnerships and employments with businesses
- Trusteeships and Governorships at other educational institutions and charities
- Any relevant material interests relating to close family members or a member of the same household. This includes but is not limited to, a child, parent, spouse or civil partner.

For each interest, the register will capture:

- The name of the business
- The nature of the business
- The nature of the interest
- The date the interest began

This register will be kept at Trust level and relevant business, and pecuniary interests will be published on the Trust website.

The Trust should plan for the register to be reviewed and updated annually (however, the Trust should be informed of any changes to business interests as and when they occur throughout the year).

There is not a comprehensive definition of what constitutes a business interest. In all cases, the natural meaning of the words must be put in the context of the contract or other matter being discussed. Further guidance on what constitutes a business interest is provided in appendix 1.

Related Party Transactions

The Trust will maintain records of any related party transactions to show that transactions with these parties have been conducted in accordance with the high standards of accountability and transparency required within the public sector.

The Trust is required to obtain DFE approval in advance of all transactions with related parties. The Chief Operating Officer or Head of Finance must be notified of an intention to purchase goods or services from a related party before a contract or purchase order is issued.

The Chief Operating Officer or Head of Finance will complete the DFE online form to request permission and will notify the relevant member of staff of the outcome.

The Chief Operating Officer or Head of Finance will prepare a report detailing any transactions with related parties for each meeting of the Audit and Risk Committee.

Appendix 1 – What constitutes a Business Interest

Direct Business Interests

The following are examples of a direct business interest: -

- actual payments.
- receipts or cash in kind.
- benefits or losses arising from the value of assets (e.g. land owned by a Director/Governor/member of staff that might be affected by proposals about the Trust/school's land or buildings).

Indirect Business Interests

Several matters can be treated as an indirect business interest. Some examples are as follows: -

- a Director/Governor/member of staff owns shares in, or is a member of a company, or another body which has a direct business interest.
- a Director/Governor/member of staff is a business partner of a person, or company who has a direct business interest.
- a Director/Governor/member of staff is employed by a person, or company which has a direct business interest.
- a Director/Governor/member of staff has a spouse or is living with another person who has an interest in the contract or matter being discussed.
- the contract or matter relates to an appointment at the Trust/school which could result in another vacancy for which the governor or member of staff could be a candidate.

Interests that are not Business

Some matters are not considered as creating a business interest. Some examples are as follows: -

- being a councillor on a local authority.
- being a rate payer or council taxpayer in the area of the Trust/school.
- for employees, having an interest that is no greater than the interest of the generality of staff in a matter.
- having interests that are non-business.
- having an interest that is so remote or insignificant that it cannot reasonably be regarded as likely to influence a Director/Governor/member of staff.

Appendix 2 – Declaration of Business Interests Form

Please note that, for Audit purposes, ALL Business Interest Declarations Forms MUST be completed and returned to OLoL by a deadline of 30th September.

2026/27

Name: ..... (please enter your name clearly)

Academy Name: ..... (for Governors/Staff)

If applicable, please circle your responsibility within the Trust/Academy: Director / Governor / Senior Leader

Name of Business	Nature of Business	Nature of Interest	Date of Appointment or Acquisition	Date of Cessation of Interest	Date of Entry

I certify that I have declared all beneficial interests **which I or any person closely connected with me** have with **ANY** businesses or other organisations (regardless of whether there are/are not links to the School or Trust).

Signed ..... Date .....

(Please Note: Electronic Signatures are NOT acceptable and NIL returns are required – thank you)