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BPET Surplus & Reserves Policy
BPET Anti-bribery, Anti-fraud and Corruption Policy
BPET Whistleblowing Policy
Anti-fraud and Corruption Policy
Declared Conflicts of Interest Register

Members of the BPET Board will also be required to declare any conflicts of interest where their religious, political or personal views could interfere with their ability to make decisions in the best interests of BPET.

Each declaration of interest will be recorded on the BPET or school's Declared Conflicts of Interest Register.

This register will allow all trustees and relevant employees to identify any business, commercial, financial or personal interests they have.

Details of each interest will be recorded on the register, including the following:

- The nature of the business and/or interest
- The name of the business and/or interest
- The date the interest began
- A brief description of duties or responsibilities
- The date of cessation of interest
- The date of entry onto the register

If a new interest becomes applicable during the school year, it will be the responsibility of the individual concerned to amend the Declared Conflicts of Interest Register.

The General Interests Register will be published publicly on the BPET or school website

The relevant business and pecuniary interests of members, trustees, BPET Central Team staff, including the

If a member is unsure whether they are conflicted, they will declare the issue and discuss it with the rest of the BPET Board or the Company Secretary

If a member is aware of an undeclared conflict of interest affecting another member, they will be required to notify the rest of the BPET Board for appropriate action.

If the person making the declaration is only one of a number participating in the BPET Board's discussion and decision-making process, the declaration will be made to the other participants. If the person making the declaration is the only person making a decision on behalf of the BPET Board, the declaration will be made to the Company Secretary. If the person making the declaration is the Chief Executive, the declaration will be made to the chair of trustees

Staff will declare conflicts of interest to the headteacher/chief executive and ensure that this information is up-to-date.

If new conflicts of interest arise for trustees or staff, they will inform the chair of trustee or the chief executive and the registers will be updated.

The BPET Board will consider any conflict of interest declared, ensuring that any potential effect on decision-making is eliminated.

If an individual has declared an interest, they will be required to leave the room when the matter is being discussed.

Where there is a conflict of loyalty and the affected member does not stand to gain any benefit, they will be required to declare the interest.

The rest of the BPET Board will decide on what level of participation in decision-making, if any, is acceptable on the part of the conflicted member.

> The BPET Board will decide whether the affected member:
> Can participate in the decision, after having registered and fully declared their interest.
> Can stay in the meetings where the decision is discussed and made, but not participate.
> Must be withdrawn from the decision-making process.

When deciding which course of action to take, the BPET Board will:

> Always make their decisions in the best interests of BPET and its pupils.
> Always protect the BPET's reputation and be aware of the impression that their actions and decisions may have on others
> Always be able to demonstrate that they have made decisions in the best interests of the school and its pupils, and independently of any competing interest.
> Require the withdrawal of the affected member from any decisions where their other interest is relevant to a high-risk or controversial decision or could significantly affect the member's decision-making.

Allow a member to participate where the existence of their other interest poses a low risk to decision-making in BPET's interest or is likely to have only an insignificant bearing on their approach to an issue.

Be aware that the presence of a conflicted member can affect trust between other members of the BPET Board, could inhibit free discussion, and might influence decision-making in some way.

If the BPET Board is discussing the appointment of a post, or making decisions that may lead to a staff vacancy, regarding a role for which a governor could apply, the member in question will be required to leave the discussion, as this is classed a conflict of interest.

Members of the BPET Board who have declared an interest will not be able to vote or make decisions regarding that topic, including any financial activity connected to the matter, and will not be present when the vote is taken.

The Clerk to the BPET Board will record an entry in the minutes when an individual withdraws from a meeting.

Declarations will be clearly recorded so that there can be no potential for misunderstandings.

In circumstances where participation is unavoidable, the chair of trustees will consider the risks associated with the situation and advice will be sought from the Company Secretary

For the purposes of reporting to the ESFA, transactions with related parties will not include salaries and other payments made by BPET to a person under a contract of employment through BPET's payroll.

When completing the ESFA's online form, all the information required to complete the form will be collected – it is not possible to partially complete a form and then return to it.

The following information is needed to create a record for the supplier:

- The name of the supplier
- The supplier's address
- The supplier's company number which can be found using the Companies House website (for limited companies)
- The statement which best describes the relationship between the supplier and BPET
- Confirmation that the supplier is listed on BPET's register of interests
- Confirmation that

BPET will keep up-to-date records and make sufficient disclosures in their annual accounts to show accordance with the high standards of accountability and transparency required within the public sector.

BPET's register of interests will include business and pecuniary interests, 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.
- Any other interests deemed relevant by the board of trustees.

The register of interests will identify any relevant material interests from close family relationships between BPET's members, trustees and local advisers. It will also identify relevant materials arising from close family relationships between those individuals and employees.

Relevant business and pecuniary interests of members, trustees, and BPET Central Team senior leaders will be published on BPET's website.

The company secretary

I declare as a Trustee/Local Adviser/Senior Employee of _____ that I hold the following personal and/or pecuniary interest(s):

Current employment	
Businesses (of which I am a partner or sole proprietor)	
Company directorships – details of all companies of which I am a director	
Charity trusteeships – details of all companies of which I am a trustee	
Membership of professional bodies, membership organisations, public bodies special interest groups of which I am a member and have a position of general control or management	
Gifts or hospitality offered to you by external bodies while acting in your position as a local adviser/trustee and whether this was declined or accepted in the last 12 months	
Contracts offered by you for the supply of goods and/or services to BPET/school	
Any other conflict	

From 1 August 2018 individuals will be automatically disqualified from acting as a trustee of a charity if:

- one or more of the reasons in Annex A apply; and
- they have not obtained a waiver of that disqualification from the Charity Commission.

Read the automatic disqualification guidance[1] to decide if you will be disqualified from 1 August 2018

Complete and sign this declaration to confirm that you will not disqualified.

If one of the disqualification reasons does apply, you may be able to apply for a waiver from the Charity Commission[2] which will allow you to take up or continue to act as a trustee.

Pass a copy of the completed declaration to BPET Trustees for the charity's records (the declaration should not be sent to the Charity Commission).

[1] https://www.gov.uk/guidance/automatic-disqualification-rules-for-charity-trustees-and-charity-senior

After 1 August 2018, you will be automatically disqualified from acting as a trustee if:

1. You have an conviction for any of the following
   a) an offence involving
   b) a offence
      a. to which Part 4 of the Counter Terrorism Act 2008 applies
      b. under sections 13 or 19 of the Terrorism Act 2000
   c) a offence within the meaning of section 415 of the Proceeds of C3lfqime Act 2002
   d) a offence under sections 1, 2, 6 or 7 of the Bribery Act 2010
   e) an offence of under section 77 of the Charities Act 2011
   f) an offence of or yes/no
   g) In relation to the above offences, an offence of attempt, conspiracy, or incitement to commit the offence; aiding, or abetting, counselling or procuring the commission of the offence; or, under Part 2 of the Serious Crime Act 2007(encouraging or assisting) in relation to the offence
2. You are (i.e. subject to notification requirements of Part 2 of the Sexual Offences Act 2003)
3. You have an unspent sanction for for making, or causing to be made, a false statement or for making, or causing to be made, a false statement in a document verified by a statement of truth
4. You have been found guilty of under section 336(1) of the Charities Act 2011.
5. You are for the purposes of Part 1 of the Terrorist Asset Freezing etc. Act 2010, or the Al Qaida (Asset Freezing) Regulations 2011.
6. You have by the Charity Commission, the Scottish charity regulator, or the High Court due to misconduct or mismanagement
7. You have of a charity by the Charity Commission, the Scottish charity regulator, or the High Court due to misconduct or mismanagement
8. You have been under section s34(5)(e) of the Charities and Trustee Investment ( ) Act 2005 (or earlier legislation)
9. You are or have given a disqualification undertaking, and leave has not been granted (as described in section 180 of the Charities Act) for you to act as director of the charity
10. You are (or subject to bankruptcy restrictions or an interim order)
11. You (IVA) to pay off debts with creditors
12. You are a moratorium period under , or a debt relief restrictions order, or an interim order
13. You are subject to an order made under s.429(2) of the Insolvency Act 1986. ( )