



## Integrity and Conflicts of Interest Policy – DCP 010

**Policy Owner:** Stephen Beeson

**Policy Date:** 7 March 2017

### Introduction

The Drapers' Multi-Academy Trust (MAT) expects all those associated with it to follow the highest ethical standards at all time. In most cases, understanding the difference between what is right and what is wrong is straightforward. The purpose of this policy is to give guidance on areas of integrity and conflicts of interest that may be less straightforward.

### Scope

This policy applies to all directors, governors, staff and pupils of the Drapers' Multi-Academy Trust (MAT). It also applies to parents and carers of pupils at schools within the MAT, who formally confirm that they will abide by our policies when their children join our schools.

Each school within the MAT must ensure that the contents of this policy are communicated to all staff. This communication must be evidenced in writing and refreshed on an annual basis. All parents must formally accept this policy when their children join a MAT school and this acceptance must be evidenced in writing through the Home-School Agreement.

Each school within the MAT must publish this policy on its website.

### Definitions

<b>Child</b>	Anyone under the age of 18.
<b>COO</b>	Chief Operating Officer.
<b>Entertainment</b>	Payment of the costs of an activity that is not directly related to business or a professional contact but is designed to achieve some form of business or professional benefit.
<b>Gift</b>	A present linked to some form of business or professional relationship.
<b>Hospitality</b>	The payment of someone else's expenses, usually in the form of a meal or refreshments.
<b>LGB</b>	Local Governing Body, with delegated powers of governance from the board of the MAT.
<b>MAT</b>	Drapers' Multi-Academy Trust.
<b>Parent</b>	Those having parental responsibility for the care of a Child (including Carers).



<b>Pecuniary Interest</b>	An interest that a person has in a matter because of a reasonable likelihood or expectation of appreciable financial gain or loss to the person.
<b>Pupil</b>	Anyone enrolled at a MAT school (including students in Years 12 and 13).
<b>Sponsors</b>	The Drapers' Company and Queen Mary University of London
<b>Staff</b>	Anyone employed by the MAT.

### **Policy**

1. It is the responsibility of the Principal of each school within the MAT to ensure that the highest standards of integrity are maintained within their school and to establish appropriate internal procedures.
2. It is the responsibility of the LGB to ensure that the school has internal procedures in place to support the integrity and conflict of interest requirements.
3. It is the responsibility of the COO to ensure that the highest standards of integrity are maintained within the Shared Services function and to establish appropriate internal procedures to implement the requirements of this policy.
4. It is the responsibility of the COO to ensure that an annual risk review is performed to consider ethical risk across all schools within the MAT and that the MAT has procedures and controls in place to address the identified risks.
5. It is never permissible to use someone else outside the MAT to perform actions that would be prohibited to an individual covered by this policy.
6. Any breaches of this policy will be subject to the sanctions set out in the Staff Disciplinary Policy – DCP 022.

### **Gifts, Hospitality and Entertainment**

7. No one associated with the MAT must offer or give anything of value to someone else – either within the school or outside – with the intent to obtain an improper advantage or a corrupt effect.
8. No gift may be given to anyone outside the MAT to a value of greater than £50. The Principal of the school concerned and the COO must preapprove all gifts below this value. The Chair of the MAT must preapprove gifts under £50 made by the Shared Services function.
9. No gift may be accepted to a value of greater than £15. If a gift appears to be greater than £15 then the value must be assessed by the COO whose determination is final. Gifts over £15 must be returned, explaining that they are contrary to school policy.



10. Hospitality up to a value of £20 per person is permitted for business related meals or drinks with individuals outside the MAT, subject to approval by the Principal. The Chair of the LGB must approve hospitality incurred by the Principal. The Chair of the MAT must approve hospitality incurred by the COO.
11. Entertainment (see definition above) is not permitted, with the single exception of events hosted by the Sponsors.
12. Internal staff hospitality and events are permitted within budget and the allowable income tax levels.

### **Third Parties**

13. The MAT will only do business with companies that have an appropriate ethical background and that behave in accordance with the same standards of integrity as the MAT. It is the responsibility of the COO to conduct such background checks as are reasonably necessary to satisfy him or herself that the third party business is of the appropriate standing, using the standards set out in the guidance to the UK Bribery Act as a benchmark.

### **Conflicts of Interest**

14. Conflicts of interest occur when an individual's personal, social, financial or political interests influence, or may appear to influence, that person's objectivity or independence in regard to the performance of their role within, or responsibilities to, the MAT.
15. A conflict of interest is, of itself, neither unusual nor inappropriate. However, what is critical is that it is a) disclosed and b) managed correctly. It is only in extremely rare occasions that an appropriate form of management action cannot be found to manage an actual or potential conflict.
16. All directors and governors must declare any pecuniary or other business interest that they have in connection with the governing body's business in the Register of Business Interests, and sign an annual confirmation of any such interests.
17. All directors and governors must declare any pecuniary interests at the start of any board or LGB meeting. The Chair (or in the case of the Chair making such a declaration, the Vice-Chair) will determine how the matter should be addressed in order to avoid any conflict of interest.
18. All employees of the MAT, whether permanent or temporary, must declare to their line manager if they have, or think they may have, an actual or potential conflict of interest.
19. All new employees must declare any conflicts of interest when signing their contract of employment.
20. Where an employee makes a makes a conflict of interest declaration, the Line Manager must record it and report it to the Principal. The Principal and the

Line Manager are then responsible for a) determining whether a conflict exists and b) what steps are necessary to mitigate the risk.

21. The decision of the Principal and the Line Manager must be recorded in writing and sent to the individual concerned with a copy to the HR function. The HR function is responsible for filing this copy on the employee's personal record.
22. HR must review all conflict of Interest statements on an annual basis and obtain confirmation from the relevant line managers that a) the conflict still exists and b) that no concerns have arisen.
23. Concealing a conflict of interest is a disciplinary offence.

#### **Personal Relationships between Members of Staff**

24. It is a normal part of life that members of staff will have personal relationships with other members of staff. These must be disclosed as potential conflicts of interest in the normal way (members of staff that are already publicly married and share the same name may assume that the fact has already been disclosed), but it is extremely unlikely that any further action will be necessary unless they are part of a direct management reporting line.
25. Where a member of staff is in a personal relationship with another member of staff to whom they report, either directly or indirectly, then the Principal must take steps to eliminate any potential conflicts of interest. Specifically, all staff management decisions, performance reviews, pay awards, promotions and any decision favouring the employee concerned – either directly or indirectly – must be reviewed by an independent senior member of staff. All such decisions and actions must be documented and the records maintained by HR.
26. It is considered that it is impossible to manage the conflicts of interest inherent in either a Principal or the COO entering into, or being in, a personal relationship with a member of their staff. Should such a situation occur, it is for the Chair of the LGB to determine which individual should remain in post and which should step down. For the latter, every effort will be made to find an alternative post within the MAT but should this prove impossible, then the individual will be requested to resign.
27. In the event of the nominated individual being unwilling to resign, the Principal will be liable to summary dismissal for creating a conflict of interest that cannot be resolved.

#### **Personal Relationships between Staff and Pupils**

28. There is never any set of circumstances where a personal, as opposed to a professional, relationship between a member of staff and a pupil is acceptable.
29. Any member of staff that enters into a personal relationship with a pupil is liable to disciplinary measures, up to and including dismissal.



30. Any member of staff entering into a sexual relationship with a pupil, regardless of that pupil's age, will be summarily dismissed and reported to the Local Authority Designated Officer (LADO).
31. Any member of staff entering into a sexual relationship with a pupil under the age of 18 is committing a criminal offence and the Principal is required to report any such incident to the Police.

### **Review**

27. The policy owner must keep up to date with relevant legislation and government guidance and update this policy whenever necessary. The board of the MAT must approve the revised version.
28. The policy owner must review the policy at the end of July each year and either submit a revised policy for board approval or confirm in writing to the COO that the current version of this policy is still fit for purpose.
29. The COO must submit a list of all confirmed policies to the board at the first meeting of each new academic year.
30. The MAT board must formally review and re-approve this policy every five years.