KALEIDOSCOPE
Multi Academy Trust

Academy Tendering and Procurement Policy

Approved by:	Kaleidoscope Trust Board	**Date:**	September 2026
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Statement of intent

Kaleidoscope Multi Academy Trust aims to achieve value for money on all its tendering and procurement activities by ensuring that a competitive and compliant tendering policy is consistently applied. The trust will ensure it is able to show that public funds have been used as intended by Parliament. With that in mind, this policy has been created to establish procedures to ensure all members of staff involved in tendering and procurement are aware of the standards that they are expected to follow.

Preferred suppliers will be used, wherever possible, as the academy has had previous positive interactions with these suppliers. During tendering and procurement processes, the following four key objectives will always be kept in mind:

- **Achieving value for money** – including the cost of goods and services, the quality of goods and services, and administrative costs
- **Ensuring fairness** – ensuring that all parties are treated in a fair and equitable manner
- **Establishing accountability** – taking responsibility for expenditure and the conduct of staff
- **Allowing probity** – ensuring there is no private gain from the academy's financial affairs

1. Legal framework

This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- The Academies Act 2010
- Equality Act 2010
- The Public Contracts Regulations (PCR) 2015
- DfE 'Academy trust handbook 2026' (ATH)
- DfE 'Academy trust governance guide'
- DfE 'Report or seek approval for related party transactions: summary guidance'
- HM Treasury 'Review of the tax arrangements of public sector appointees'
- DfE 'Buying for schools: things to consider before you start'
- DfE 'Buying for schools'
- DfE 'Maximising value for pupils'
- DfE 'Achieving better value when buying'
- DfE 'Maximising school and trust resources: managing financial and physical assets'
- DfE 'Strategic workforce planning for schools and trusts'
- DfE 'Improve your school's and trust's digital and financial planning'
- The Public Procurement (Agreement on Government Procurement) (Thresholds) (Amendment) Regulations 2021

This policy operates in conjunction with the following school policies:

- Data Protection Policy
- Contractors Policy
- Business Continuity Policy
- Conflicts of Interest Policy
- Anti-fraud and Corruption Policy
- Finance Policy
- Reserves and Investment Policy
- Records Management Policy

2. Roles and responsibilities

The members are responsible for:

- Where necessary, by special resolution, issuing direction to the trustees to take a specific action.
- Conducting the business of the trust in accordance with company and charity law and adhering to the trust's funding agreement with the Secretary of State.

The board of trustees is responsible for:

- Applying the highest standards of conduct and governance and taking full ownership of their duties.
- Approving a written scheme of delegation of financial powers.
- Managing conflicts of interests and related party transactions.
- Approving a balanced budget for the financial year and minuting the approval.
- Appointing an audit and risk committee to advise on the adequacy of the trust's controls and risks.
- Having a basic understanding of the financial cycle, legal requirements on accountability, procurement and an oversight of the trust's spending.
- Ensuring that finances are used to deliver maximum value for pupils.

The accounting officer is responsible for:

- The trust's financial affairs.
- Achieving value for money and the best possible educational outcomes through the economic, efficient, and effective use of resources.
- Ensuring regularity when dealing with items of income and expenditure in accordance with legislation, the terms of the trust's funding agreement and the ATH, and with the trust's internal procedures.
- Ensuring propriety with regards to expenditure and receipts, including standards of conduct, behaviour, and corporate governance.
- Keeping full and accurate financial records.
- The management of opportunities and risks.
- Assuring the board of trustees that the trust is compliant with the ATH and the funding agreement.
- Informing the board of trustees, in writing, of any action or policy under consideration that is incompatible with the terms of the Articles of Association, funding agreement or the ATH.

The Chief Financial Officer (CFO) is responsible for:

- Acting as the principal finance officer for the trust.

- Ensuring that all financial matters focus on the wider needs of the trust, rather than on any individual academy.
- Challenging finance staff to ensure that value for money is routinely obtained.
- Ensuring effective financial policies are in place across the trust.
- Liaising with the headteacher and SBM from each academy regarding financial matters.

The headteacher is responsible for:

- Prioritising and allocating financial resources appropriately, ensuring efficiency, effectiveness, and probity in the use of public funds.
- Implementing the decisions of the trust board.
- Ensuring that all monies controlled by the school are handled in accordance with LA regulations and sound financial practice.
- Overseeing staff dealing with finances and ensuring that procedures are carried out accurately.
- Making **monthly** checks of procedures.

The School Bursar is responsible for:

- Controlling, monitoring and evaluating the school's finances, ensuring compliance with financial requirements and regulations.
- Working with and maintaining administrative systems, ensuring that maximum efficiency is achieved.
- Providing reports, as requested, on current school accounts to the finance committee and CFO.
- Ensuring that orders, invoices, and other financial documents are processed according to established procedures.
- Checking the accuracy of information and providing regular reports to the headteacher and CFO.
- The financial management system and all financial and personnel papers, ensuring that only authorised staff members have access to personnel files and that arrangements to access their own files are in.
- Maintaining a list of all assets for their school and providing this information to the CFO.
- Advising the headteacher on matters of financial administration or maladministration.

Centralised Procurement

As a Multi Academy Trust, procurement will normally be coordinated through the central finance team where:

- Trust-wide contracts exist.
- Aggregated purchasing can achieve savings.
- Specialist procurement expertise is required.

- Strategic contracts are being procured.

Schools must not independently procure items where a Trust-approved contract exists.

3. Using a framework agreement

Where possible, the trust will use a framework agreement to purchase goods, works or services. Each framework agreement has:

- Details of the products and services available.
- An agreed pricing structure.
- Details of the suppliers.
- Instructions on how to buy.
- An agreed set of terms and conditions.

When using a framework agreement, the trust has two options:

1. Select a supplier direct from a framework agreement.
2. Run a 'mini-competition' – where suppliers are asked to send a bid and the best one is chosen.

The framework agreement will state whether the trust can select a preferred supplier itself or if a mini-competition must be run. If the trust can select a supplier itself, the framework agreement will set out the rules for doing so which the trust will follow.

When running a mini-competition, the trust will:

- Comply with the terms of the framework agreement.
- Decide how it will assess bids, following any rules the framework has.
- Decide the level of service required.
- Decide if it wants to run an expression of interest process.
- Send an invitation to tender to all suppliers who can provide what the trust needs.
- Fairly assess all bids received.
- Choose the supplier that offers the best value for money.
- Award the contract to the winning supplier.

4. Procurement and spending decisions

Procurement basics

The trust will ensure that:

- Spending is for the purpose intended and there is probity in the use of public funds, including in relation to any actual or perceived conflicts of interest.
- Spending decisions represent value for money.
- Internal delegation levels exist and are applied.
- A competitive procurement procedure is in place and incorporated into the trust's financial framework, and the procurement rules and thresholds in the Procurement Act 2023 and its associated regulations and Find a Tender service are observed.
- Appropriate due diligence is in place.
- Professional advice is obtained where appropriate.

Procurement thresholds

The trust will run a PCR compliant buying process if:

- It cannot get what is needed through one of the DfE's recommended deals for schools or a framework agreement.
- Something is being bought that is over the PCR procurement thresholds.

The following thresholds are in place in relation to how goods, works or services can be procured:

Order value	Process required
Low - under £10,000	Framework agreement or at least three quotes from suppliers
Medium - £10,000 to £40,000	Framework agreement or at least three quotes from suppliers
High - over £40,000 and up to PCR procurement thresholds	Framework agreement or advertise a contract and run a buying process
Over PCR thresholds: Goods and most services – £213,477 Works – £5,336,937	Framework agreement or PCR-compliant buying process (unless covered in the list of services in the lighter touch regime, in which case the threshold is £663,540)

Specifications

No matter what procurement process is followed, a specification will always be written outlining what the trust wants to procure. All specifications will include:

- A precise description of the goods, work or services required and what it should do.
- The amount required and when it is needed.
- The expected quality of the goods, work or services.

5. Maximising value for pupils

The Trust will ensure that all tendering and procurement activity secures best value for money and maximises the impact of resources for pupils across the Trust. Procurement decisions will be transparent, proportionate and compliant, and will support the effective delivery of the Trust's educational objectives.

Principles

The Trust will ensure that procurement activity:

- Delivers value for money, balancing cost, quality, sustainability and risk.
- Is compliant with the Academy Trust Handbook, DfE guidance and all relevant legislation.
- Is informed by benchmarking, market awareness and robust financial data.
- Makes effective use of national, DfE-approved and sector-recognised procurement routes.

Procurement and Commercial Spend

The Trust will adopt a structured and value-driven approach to all commercial spend. In particular, the Trust will:

- Use the Financial Benchmarking and Insights Tool (FBIT) and other relevant data sources to inform procurement decisions, identify potential inefficiencies and assess value for money across the Trust.
- Use compliant procurement routes, including DfE–approved and Crown Commercial Service frameworks, where these provide demonstrable value and reduce commercial and legal risk.
- Consider and, where appropriate, adopt DfE-backed national deals and commercial solutions, including energy, insurance and other centrally negotiated arrangements.
- Use the Get Help Buying for Schools service to support compliant tendering processes and ensure open and fair competition.

Tendering and Contract Management

The Trust will ensure that tendering and contract management arrangements support best value over the full life of each contract. The Trust will:

- Undertake competitive tendering, quotation or benchmarking exercises in line with the Trust's financial thresholds, scheme of delegation and regulatory requirements.
- Ensure that tender specifications and evaluation criteria are clearly defined, objective and aligned to Trust priorities, including cost, quality and service performance.

- Maintain effective contract management arrangements to monitor supplier performance, compliance and delivery of agreed outcomes.
- Regularly review contracts and seek to reduce reliance on high-cost, poor-value or non-compliant suppliers.

Governance, Delegation and Capability

The Trust will ensure strong governance and appropriate capability in relation to procurement.

The Trust will:

- Ensure the Trust Board provides oversight and receives assurance that procurement arrangements are compliant and deliver value for money.
- Clearly define procurement responsibilities and approval thresholds through the Trust's scheme of delegation and financial regulations.
- Support staff involved in procurement through access to appropriate training, guidance and professional development.
- Seek expert advice and support, including from School Resource Management Advisers, where this will strengthen procurement decisions and commercial practice.

The Trust will take a proactive, consistent and evidence-based approach to tendering and procurement across all academies. By using benchmarking data, approved procurement routes and robust contract management, the Trust will aim to achieve efficiencies, manage risk and reinvest savings directly into teaching and learning, thereby improving outcomes for pupils.

6. Low and medium purchases

Any purchase or service estimates below £10,000 are considered to be 'low' purchases, and any between £10,000 and £40,000 are considered to be 'medium' purchases. Small purchases below £500 will not require approval from the board of trustees.

Where possible, the trust will use a framework agreement to purchase low and medium goods, works or services.

Where it is not possible to procure low and medium purchases through a framework agreement, quotes from at least three suppliers will be obtained prior to purchasing. All suppliers will be sent the same information, as follows:

- Specification
- Deadline for submitting the quote
- When the trust will make a decision
- How the supplier can ask questions about what the trust is buying or its process
- A link to the trust's terms and conditions, if needed

Award criteria will be set before any suppliers are contacted.

To avoid legal challenges, the trust will:

- Not open any bids before the deadline.
- Not open any late bids.
- Treat all bids fairly and equally.
- Keep confidential, secure and auditable records.
- Buy from the highest scoring supplier.

Where a relevant approved supplier list exists, approved suppliers will be used unless written permission is received from the board of trustees outlining the reasons for using an alternative supplier.

The trust will award quotes a score between **1** and **5** based on:

- The price offered to supply the goods or services.
- The quality of the goods or services to be delivered.
- How well the suppliers meet the school's specification.
- How quickly the supplier can provide the goods or services.
- The supplier's customer service.
- After-care offered by the supplier.

A record will be kept of all scores, comments, and decisions.

The trust will ensure that at least **two** people assess each bid and, when comparing scores, that they:

- Discuss where they have scored differently.
- Reach an agreed score.

The trust will send a contract, such as a purchase order, to the chosen supplier, including details of:

- What has been purchased.
- The total cost.
- The delivery address.
- The delivery date and any other important dates.
- When the trust will pay the cost.

All receipts and invoices will be kept in the **main office** for a period of **18 months** after the initial purchase. The CFO will process each receipt and ensure they are available for inspection where necessary.

The CFO will be responsible for overseeing the arrangements for the delivery of goods and checking items upon delivery. Any items that are either not part of the order, damaged or not fit for purpose will be returned. When goods are returned, the office manager will record:

- The name and product code of the item.
- The cost of the item.
- If damaged, photographic proof.
- Details of the item.
- The reason for rejection.

A record of goods rejected and delivered will be kept in the **main office**.

7. High-value purchases

The trust will seek legal advice before making large purchases.

Any purchase or service estimated to cost over £**40,000** will be put to formal tender. In the case of major building works or construction, the services of an architect will be sought before the tendering process is undertaken.

Large purchases under the PCR procurement thresholds

When the trust makes purchases with a value under the PCR procurement threshold, it will:

- Assess the market.
- Prepare the contract and tender documents.
- Advertise the school's requirements in appropriate places.
- Consider using an expression of interest to cut the number of bids needed to assess later.
- Send an invitation to tender to people who reply to the advert.
- Fairly assess all the bids received, using the same process.
- Choose the bid that offers the best value for money.
- Award the contract to the highest scoring bidder.

Large purchases over the PCR procurement threshold

When the trust makes purchases with a value over the PCR procurement threshold, it will have regard for:

- delivering value for money
- maximising public benefit
- sharing information and being transparent
- integrity

- treating suppliers the same
- not putting a supplier at an unfair advantage or disadvantage
- small and medium enterprises
- National Procurement Policy Statements

The trust will:

- Assess the market.
- Check the relevant frameworks to see if the purchase is available via an alternative route.
- Prepare the contract and invitation to tender.
- Consider whether to use the restricted procedure to reduce the number of bids to assess later, or the open procedure to let anyone bid.
- Advertise a contract notice using the e-notification service Find a Tender (FTS).
- Make the invitation to tender and all other documents available electronically from the time that the contract notice is published.
- Assess all the bids fairly, using the same process.
- Choose the supplier that offers the best value for money.
- Award the contract to the highest scoring bid supplier.

8. Invoices

All invoices will be recorded and stored for future reference, with checks on the following information:

- The mathematical validity
- The purchase ledger
- The goods or services ordered and delivered
- Any difference between the agreed and delivered price
- The authorisation for payment
- The amount paid in VAT
- The total payment made

The CFO will create **weekly** invoice reports which are submitted to the headteacher.

9. Risk management

The trust will maintain a risk register and manages risks to ensure its effective operation.

The board of trustees will retain ultimate responsibility for risk management, including ultimate oversight of the risk register, drawing on advice from the audit and risk committee. The board of trustees will review the risk register as required and at least annually.

The trust's risk management will include contingency and business continuity planning.

The trust is protected from risk by the RPA.

The trust will cooperate with risk management auditors and risk managers, implementing any reasonable risk management audit recommendations.

10. Types of tender

Open tender

Open tender is the trust's preferred method of tender due to its open and competitive nature. Open tender is used for all goods or services under £5,000.

All interested suppliers will be invited to tender, with the CFO making a recommendation to the headteacher. The headteacher has the final say in selecting the successful tender.

Advertisements in trade publications will be used to attract bids for tender.

Restricted tender

Where a restricted tender is used, only specified suppliers chosen by the CFO are invited to bid. The trust will establish a shortlist of five bids during the restricted tender.

Restricted tender will be used in any of the following circumstances:

- There is a need to maintain a balance between the contract value and administrative costs
- The service required is specialised
- The cost of public advertisement outweighs the potential benefits of open tender

Negotiated tender

Where a negotiated tender is used, the terms of the contract will be negotiated with the supplier. Negotiated tender is only used in any of the following circumstances:

- Other types of tender have been used and have not found any suitable suppliers
- Very few suppliers are available
- There is an urgent need for a service

11. Preparation for tender

In preparing for a tender, the CFO will consider the following:

- The overall objective of the project

- Any technical skills required to complete the project
- Any after-sales services required
- The form of the contract

12. Invitation to tender

The trust will make all necessary documents available online when the advert has been placed on the FTS. These include:

- A covering letter.
- A timeline.
- How to ask questions.
- How to submit a bid.
- Specifications.
- A list of things the trust requires prices for.
- The award criteria.
- The level of service required.
- Any contract management needs, such as regular meetings or contact.
- If needed, an invitation for suppliers to give a demonstration.
- **[When the trust is running the restricted tender]** The standard selection questionnaire.
- The proposed contract drafted as far as possible.

13. Tender evaluation

When making purchases, the trust will:

- Decide the method of assessing the bids.
- Get bids from at least three suppliers.
- Assess all the bids received fairly and according to the specification.
- Choose the supplier that offers the best value for money.

When evaluating a tender, the following financial implications will be considered:

- Lower costs may not necessarily be the most favourable, e.g. when they result in a reduced service
- The price being considered should be the total cost, without extra fees or hidden costs

- Where there is scope for negotiation, the CFO needs to ensure the best possible value for money

When evaluating a tender, the following technical requirements will be considered:

- Certificates of conformity
- Conformity of standards
- The qualifications and experience of the supplier
- Descriptions of technical services and facilities
- Quality control procedures
- Details of previously delivered services
- References from previous customers

When considering a tender, the following other requirements will be considered:

- Pre-sales demonstrations
- After-sales service
- The financial viability of the supplier

14. Tender acceptance

Invitations to tender will always state the date and time the completed tender documents are to be received by the CFO.

Suppliers will be required to submit documents in marked brown envelopes clearly stating they are tender documents. All envelopes will be clearly marked upon arrival and securely stored in the **main office**.

Tender documents received after deadlines will not be considered unless the supplier provides proof of exceptional circumstances.

Informing unsuccessful bidders

The trust will provide a letter including the following information to all unsuccessful bidders at the same time:

- The name of the winning bidder
- The award criteria used
- The reasons for the decision,
- When the standstill period ends
- Their scores and feedback

The trust will only comment on their unsuccessful bid and will not share details of anyone else's bid. The trust will try to give constructive feedback.

Informing the successful bidder

The trust will provide a letter including the following information when informing the successful bidder that they have won:

- The award criteria used
- Their scores
- Why the trust thinks their bid is the most economically advantageous
- When the standstill period ends

The trust will use the letter as an invitation to finalise a contract. The letter will make it clear that:

- The trust will only award them the contract if the standstill period passes without a challenge from another supplier.
- There are no commitments, and no work should begin, until both sides have signed the contract.

15. Tender opening

All offers for tender will be opened at the same time, with a minimum of two members of staff present, one of whom will be the CFO.

A record will be kept of all the suppliers who submitted tenders, along with the amount tendered. A record will be signed by all members of staff who are present at the opening of a new tender. The records will be stored in line with the trust's Records Management Policy.

16. Staff involvement in evaluating offers for tender and quotes

The CFO will be responsible for ensuring that none of the members of staff involved in the tender process are subject to conflicts of interest.

Members of staff who are involved in decision making will never accept gifts or hospitality from suppliers.

A full record of the evaluation process will be maintained by the CFO.

17. Contracts

The trust will seek legal advice before entering a contract and ensure that it has a contract management plan in place. Non-routine tenders or purchases, such as leases, will be subject to a contract, which is signed before the work begins or goods are delivered.

A meeting will be arranged with the supplier to finalise the management and payment arrangements, clarify key performance indicators, and agree how they will work together.

All contracts will include the following details:

- A detailed description of the goods, works or services the school has agreed to buy, linked to the specification

- A pricing schedule – what will be paid when
- Terms and conditions
- The level of service wanted – this may include service level agreements (SLA) and/ or 'key performance indicators' (KPIs)
- Any contract management arrangements such as regular meetings or contact.
- An 'implementation plan' saying who is responsible for what.
- What happens at the end of the contract
- The written specification, as an appendix to the contract
- The timeline and completion date of the work
- An exit process
- The requirements for any companies being employed by the supplier

If the supplier is employing another company to undertake some, or all, of the work, or to provide goods, it is the supplier's responsibility to ensure the company has:

- Health and safety policies in place.
- The relevant insurance.
- The required professional qualifications.
- Proof of certification.

Copies of all contracts will be securely stored in the central record located in the **main office**.

The trust will ensure it places a contract award notice in the FTS within 30 days of awarding the contract.

Challenges from unsuccessful bidders

The trust will maintain the following minimum standstill period between notifying the winning bidder and awarding the contract, depending on the means of communication used to transmit the standstill notice:

- Notices communicated by electronic means: **10** calendar days
- Notices communicated by non-electronic means: **15** calendar days

If this period ends on a non-working day, this will be extended to the end of the next working day.

During the standstill period, if an unsuccessful bidder challenges the fairness of the contract award decision or process, the trust will contact them and explain that the assessment process was conducted fairly and that the trust has kept good records – legal advice may be sought depending on the nature or seriousness of the challenge.

If an unsuccessful bidder makes a formal challenge, the trust will not finalise the contract, and will seek legal advice before proceeding.

The end of a contract

The school will plan for the end of a contract in advance by:

- Returning the supplier's equipment, where required.
- Terminating any joint arrangements.
- Disposing of or removing any unwanted items.

The school will follow its exit process where a contract needs to end prematurely.

18. Related party transactions

The trust will be even-handed in their relationships with related parties by ensuring:

- Trustees will avoid any conflicts of interest, declare their interest in proposed transactions and arrangements, and will not accept benefits from third parties.
- All members, trustees, local governors and senior employees will complete the register of interests, which is kept up-to-date.
- No member, trustee, local governor, employee or related individual or organisation will use their connection to the trust for personal gain, including payment under terms that are preferential to those that would be offered to an individual or organisation with no connection to the trust.
- Payments to trustees by the trust will only made where permitted by its articles of association, or by the authority of the Charity Commission, and comply with any relevant agreement with the Secretary of State.
- The trust will consider its obligations where payments are made to other businesses who employ a trustee, are owned by a trustee or in which the trustee holds a controlling interest.
- Where the trust believes a significant advantage exists in paying a trustee for acting as a trustee, the Charity Commission's approval will be obtained prior to payment.
- The trust adheres to 'at cost' requirements.
- The chair of trustees and the accounting officer will ensure their capacity to control and influence does not conflict with related party transaction requirements.
- Personal relationships with related parties will be managed in a manner that avoids both real and perceived conflicts of interest, promotes integrity and openness, and is in accordance with 'The Seven Principles of Public Life'.

The trust will recognise that relationships with related parties may attract greater public scrutiny, such as:

- Transactions with individuals in a position of control and influence, including the chair of the board of trustees and the accounting officer.
- Payments to organisations with a profit motive, as opposed to those in the public or voluntary sectors.
- Relationships with external auditors beyond their duty to deliver a statutory audit.

Record keeping

The trust will keep sufficient records, and make sufficient disclosures in the annual accounts, to show that related party transactions have been made in accordance with accountability and transparency standards.

Approval by the DfE

The trust will obtain the DfE approval for related party transactions that are novel, contentious or repercussive. Transactions involving the chair of trustees or the accounting officer will be carefully considered against this requirement.

All related party transactions will be reported to the DfE in advance of transactions taking place on or after 1 September 2023, using the DFE's online form.

The DfE's prior approval will be obtained, using the online form, for contracts and other agreements for the supply of goods or services to the trust by a related party agreed on or after 1 September 2023 where any of the following limits arise:

- A contract or other agreement exceeding £40,000
- A contract or other agreement of any value that would take the total value of contracts and other agreements with the related party beyond mean the cumulative value of contracts and other agreements with the related party exceeds, or continues to exceed, £40,000 in the same financial year ending 31 August

Approval will not be required where contracts and other agreements for the supply of goods or services to the trust are with colleges, universities and schools which are sponsors of the trust, and other state funded schools and colleges, including academies. This concession does not apply to transactions with a subsidiary of such a related party.

For the purposes of reporting to, and approval by, the DfE, related party transactions will not include salaries and other payments made by the trust to a person under a contract of employment through the trust's payroll.

When seeking approval, the trust will ensure that it has the relevant information about the supplier, including the supplier's name, address and company number. The trust will also:

- Confirm the statement which best describes the relationship between the supplier and the trust.
- Confirm that the supplier is listed in the trust's register of interests.
- Confirm that the trust has a statement of assurance from the supplier.
- Confirm that the trust has an open-book agreement with the supplier.
- Provide a short description of the goods or service, details of the proposed cost and the start and end date of any contract or agreement.

In addition, the trust will provide evidence of the following:

- How the trust agreed to the related party transaction, e.g. minutes of meetings where it was discussed
- That the trust followed this policy

- That the trust tested the market before making a decision
- How the trust managed any conflicts of interest

The trust will provide a copy of the agreement or proposed contract. The trust will upload any additional documents the trust feels are relevant as part of its submission.

The trust will ensure the information and documentation listed in the ATH has been received before the trust completes the online related party transaction form.

[Faith schools] The trust will not require approval for the provision of services for essential functions fundamental to the trust's religious character and ethos which can only be provided by their religious authority.

Register of interests

The trust will document all relevant business and pecuniary interests of members, trustees, local governors and senior employees, 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.

The register of interests will identify all relevant material interests from close family relationships between the trust's members, trustees or local governors. It will also identify relevant material interests arising from close family relationships between those individuals and employees.

The trust will consider any other interests for inclusion on the register of interests – if there is any doubt about whether an interest should be registered, it is registered.

The board of trustees will keep the register of interests up to date.

The trust will publish on its website the relevant business and pecuniary interests of members, trustees, local governors and accounting officers. The publication of interests belonging to any other individuals named on the register is at the discretion of the trust.

'At cost' requirements

The trust will not pay more than 'cost' for goods or services provided by the following:

- Any member or trustee of the trust
- Any individual or organisation related to a member or trustee of the trust, namely:
    - A relative of a member or trustee: defined as a close member of the family, or member of the same household, who may be expected to influence, or be influenced by, the person. This includes, but is not limited to, a child, parent, spouse or civil partner.
    - An individual or organisation conducting business in partnership with the member, trustee or a relative of the member or trustee.

- A company in which a member or the relative of a member (taken separately or together), and/or a trustee or the relative of a trustee (taken separately or together), holds more than 20 percent of the share capital or is entitled to exercise more than 20 percent of the voting power at any general meeting of that company.

- An organisation which is controlled by a member or the relative of a member (acting separately or together), and/or a trustee or the relative of a trustee (acting separately or together) – an organisation is controlled by an individual or organisation if that individual or organisation is able to secure that the affairs of the body are conducted in accordance with the individual's or organisation's wishes.

- Any individual or organisation given the right under the trust's articles of association to appoint a member or trustee of the academy trust, or any body connected to the individual or organisation.

- Any individual or organisation recognised by the Secretary of State as a sponsor of the trust, or any body connected to the individual or organisation.

A body is connected to an individual or organisation if it is controlled by the individual or organisation, controls the organisation, or is under common control with the individual or organisation, namely any of the following:

- Holding a greater than 20 percent capital share or equivalent interest

- Having the equivalent right to control management decisions of the body

- Having the right to appoint or remove a majority of the board or governing board

'At cost' requirements will apply to:

- Contracts for goods and services from a related party agreed on or after 7 November 2013.

- Contracts for goods and services from a related party exceeding £2,500, cumulatively, in any one financial year. Where a contract takes the trust's cumulative annual total with the related party beyond £2,500, the element above £2,500 must be at no more than cost.

- Legal advice or audit services when the organisation's partner directly managing the service is a member or trustee of the trust, but not in other cases.

[For dioceses only] Contributions made by the trust to the diocese for services received associated with securing the trust's religious character and ethos, which only the diocese can provide, will be regarded as meeting the 'at cost' requirement.

The trust will ensure that any agreement with an individual or organisation which is classed as being a related party transaction is:

- Procured through an open and fair process.

- Supported by a statement of assurance from the individual or organisation to the trust confirming their charges do not exceed the cost of the goods or services.

- On the basis of an open-book agreement including a requirement for the supplier to demonstrate clearly, if requested, that their charges do not exceed the cost of supply.

- The cost will be the full cost of all the resources used in supplying the goods or services and will not include any profit. Full cost includes:
    - All direct costs – the costs of any materials and labour used directly in producing the goods or services.
    - Indirect costs – a proportionate and reasonable share of fixed and variable overheads.

19. Monitoring and review

This policy will be reviewed **annually** by the CFO and the headteacher. All changes to this policy will be communicated with the relevant stakeholders.

The next scheduled review date for this policy is **date**.

Declaration of Conflicts of Interests Form for Governors and Trustees

I hereby certify that I understand that it is my responsibility to declare the nature of all business or personal interests, whether direct or indirect, of myself, my partner and/or members of my immediate family, that could unfairly benefit from my relationship and connection with the school.

I also understand that it is a criminal offence to:

- Withhold information relating to conflicts of interest.
- Provide falsified information.
- Fail to notify the governing board of any changes which might invalidate this declaration.

I agree to inform the board of trustees of any changes to aforementioned interests, or new conflicts of interest, at the earliest possible opportunity.

I confirm that I do not have any actual or potential conflicts of interest to declare ☐

I wish to declare an actual or potential conflict of interest and have included further details below ☐

Name	
Role	
Signature	
Date	

Declaration

Details of the declared conflict of interest	Nature of business or organisation	Brief description of the conflict of interest declared	Is the declared conflict of interest an actual conflict or a potential conflict?	Date of appointment or acquisition	Date of cessation of interest

Managing the conflict of interest

Identified conflict of interest	Agreed process for managing the identified conflict of interest	Person confirming agreed processes on behalf of the board of trustees		
		Name	Role	Date