

Governor Conflict of Interest

Valid from (academic year)	2021/2022
Next review (academic year)	2023/2024 Policies remain valid until revoked or reviewed.
Policy Owner	Director of Governance
Committee approval	N/A
Policy & EIA Approval date	November 2021
Board of governors' committee	Governance
Approval date	December 2021
Board approval necessary	Board
Date of Board approval	December 2021
Summary of Changes	New policy 2021

Governor Conflict of Interest Policy

Why the College has a Policy

1. Conflicts of interest may arise where an individual's personal, business, family or other interests and/or loyalties conflict with those of the College. These interests may be financial or emotional. Such conflicts may create problems, as they can:
 - inhibit free discussion;
 - result in decisions, or actions, that are not in the best interests of the College;
 - risk the impression that the College has acted improperly.

The aim of this policy is to protect the College and the individuals concerned from any appearance of impropriety.

2. The establishment of links between College Governors, members and staff and outside bodies - whether Government departments, commerce, industry, or others - is not only in the public interest but also benefits the College and the individuals concerned. However, it is possible that such links may give rise to conflicts of interest. The College has therefore prepared the following guidelines and rules to help individuals assess whether or not activities, discussions or decisions could cause a conflict of interest, and to outline the procedure for disclosure of any actual or potential conflict.

Guidelines as to Conflict of Interest

3. It is not possible to define all the circumstances which may cause a conflict of interest, but the following are examples of situations giving rise to a perceived conflict of interest (in any situation where an individual is uncertain as to the propriety of a given arrangement, advice may be sought from the Chair or director of Governance):
 - (a) Use of the College's equipment or administrative facilities to pursue personal, business, commercial, or consulting activities.
 - (b) Any attempt to restrict rights governing the timing and content of publications, except in circumstances properly approved by the College to protect privacy, commercially sensitive proprietary information, and patentable inventions.
 - (c) A financial interest held by an individual (or by his or her immediate relative(s) or household member(s)) in an external enterprise engaged in activities linked to the College. Examples of such interests are paid consultancies, paid service on a board of directors or advisory board, or

equity holdings in or royalty income from the enterprise. The existence of such an interest does not necessarily imply conflict, but is likely to give an appearance of conflict, and should be declared.

(d) A personal involvement (or by his or her immediate relative(s) or household member(s)) in any company or commercial enterprise which is in a contractual relationship with the College, or which is in the process of negotiating a contract with the College, where the member has been concerned or connected with placing or negotiating the contract in question or with any other activity which the contract might cover.

(e) Application by family members or friends for membership or employment in the College, where an individual is in a position to influence the appointing process.

(f) Receipt of gifts or hospitality by an individual (or by his or her immediate relative(s) or household member(s)) from a company or organisation offering goods or services to the College.

4. The College has adopted the specific rules set out below in order to declare and consider conflicts of interest:

a) Governors have a personal responsibility to declare conflicts of interest in order to fulfil their legal obligations to act only in the best interests of the College. Further guidance on conflicts of interest is available in the Charities Commission's Essential Guide to being a Trustee.

b) All Governors will be asked, on appointment, and on annual review to declare and record all other interests, employment or memberships which could be construed as a conflict. The declarations will be made on the Register of Interests form, and will be reviewed by the director of Governance, the Board and the External Auditors annually.

c) All Governors will give proper consideration as to any interests that could be perceived as a conflict, and ensure that they declare such at the start of any relevant meeting or Committee, and withdraw from any item where a perception of or actual conflict might exist.

d) The chairs of all committees will ask all members at the start of each meeting to declare any interests of conflict so that they can be properly recorded and so that the 'conflicted' person can withdraw from the appropriate item, and the minutes annotated accordingly.

e) Enter any gifts given or received in the Gift and Hospitality Register maintained by the Director of Governance in accordance with the College gifts and hospitality policy.

f) Decline or withdraw from any recruitment process involving a candidate who is related or known to the extent that a conflict exists.

Data Protection

5. Any information provided will be processed in accordance with data protection principles as set out in the GDPR policy. Data will be processed only to ensure that members of the Governing Body and others within the scope of this policy act in the best interests of the College. The information provided will not be used for any other purpose.