Conflicts of Interest Policy

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Author:	Director of Governance, Quality and Student Success
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Linked policies:	GA 3.2 Risk Management Framework; GA 3.5 Anti-Fraud, Bribery and Corruption Policy; GA 3.6 Whistleblowing Policy; GA 3.8 Procurement Policy; GA 3.3 Corporate Academic Governance Framework (CAGF)
Audience:	Staff

Contents

1. Purpose

This policy sets out how UK College of Business and Computing (UKCBC or the College) identifies, declares, records and manages actual, potential and perceived conflicts of interest. It supports effective governance, protects the interests of students, safeguards public funds, and ensures compliance with the Office for Students regulatory framework, in particular Initial Condition of Registration E7 and its associated guidance.

2. Scope

This policy applies to all individuals involved in the governance, management and decision making of the College, including:

- Members of the governing body and its committees
- Senior post holders and executive leaders
- Staff with delegated decision-making authority
- Individuals acting on behalf of the College, including consultants and advisers, where relevant

The policy applies to decisions relating to academic provision, financial management, partnerships, procurement, staffing, student matters and any other area where decisions are taken on behalf of the College.

3. Definitions

3.1 Conflict of interest

A conflict of interest arises where an individual's external interests, personal relationships, financial arrangements, or other duties could compromise, or could reasonably be perceived to compromise, their ability to act objectively, impartially and in the best interests of the College.

Conflicts may be:

- Actual: a conflict that currently exists
- Potential: a conflict that could arise in the future

- Perceived: a situation that could reasonably be viewed by others as a conflict, even if no improper influence occurs

3.2 Types of interest

Interests may include, but are not limited to:

- Financial interests such as employment, consultancy, directorships, shareholdings, ownership, sponsorship or remuneration
- Personal or family relationships, including close personal relationships that could influence decision making
- Academic, professional or commercial relationships, including involvement with competitors, awarding bodies, suppliers or partners
- Gifts, hospitality, benefits or inducements
- Competing loyalties or external duties, including trustee or board roles in other organisations

3.3 Related party

A related party is any person or organisation with whom an individual has a close association that could give rise to a conflict of interest.

4. Principles

The College is committed to:

- Acting in the best interests of students
- Maintaining public trust and confidence in its governance
- Ensuring transparency in decision making
- Managing conflicts proportionately, consistently and fairly

All conflicts must be declared and managed in a manner that protects the integrity of College decisions.

5. Roles and Responsibilities

5.1 Governing Body

The governing body holds ultimate responsibility for oversight of conflicts of interest and for ensuring that appropriate arrangements are in place.

5.2 Chair of the Governing Body

The Chair is responsible for ensuring that conflicts are appropriately declared and managed at governing body and committee meetings.

5.3 Policy Owner

The Director of Governance, Quality and Student Success is responsible for maintaining this policy, overseeing the register of interests, and providing advice on the management of conflicts.

5.4 Individuals Covered by the Policy

All individuals within scope are responsible for:

- Declaring conflicts promptly and fully
- Updating declarations when circumstances change
- Complying with agreed mitigation measures

6. Declaration of interests

6.1 Register of interests

The College maintains a Register of Interests for individuals within scope, including governing body and committee members, senior post holders and any other designated roles with delegated decision-making authority.

The Register of Interests records declared interests, related party interests where relevant, and declared gifts and hospitality where this is required by the College.

Form to complete: Conflicts of Interest Register – Fill in form

6.2 Declaration requirements

Individuals must make a declaration of interests:

- On appointment or engagement
- At least annually
- Promptly when a new conflict arises or when circumstances change
- At the start of meetings where relevant matters are being discussed

A declaration may be made in writing, or orally at a meeting, and must be recorded.

6.3 Timing and duty to declare

Individuals are expected to identify conflicts from meeting papers and declare them in advance where possible. If an individual becomes aware of a conflict during a meeting, they must declare it at the earliest opportunity.

6.4 Disclosure where an individual has not declared

Where a relevant conflict is known to the Chair, the Clerk or another appropriate officer, and the individual has not declared it, the Chair or the Clerk may record the conflict and raise it with the individual for confirmation and management.

6.5 Data protection

Information collected and recorded under this policy will be processed and retained in accordance with the College's data protection arrangements.

7. Managing conflicts of interest

7.1 Approach

Conflicts will be assessed and managed proportionately. Management decisions will take account of the nature of the interest, the significance of the decision, the risk to the integrity of decision making, and the risk to public confidence.

7.2 Management options

One or more of the following actions may be applied:

- Record the interest with no further action where the risk is low and does not affect decision making.
- Permit participation in discussion only, with no participation in decision making, where authorised by the Chair or relevant committee and where the risk is low.
- Exclude the individual from the relevant part of a meeting, including withdrawal from discussion.
- Restrict access to information related to the matter.
- Reassign responsibilities or delegate the matter to an unconflicted individual or committee.
- Require the individual to end the external activity or relationship that is creating the conflict.
- In exceptional cases, request resignation from a role, committee, or office.

7.3 Quorum and voting

Where an individual is excluded from an agenda item due to a conflict, they will not be counted towards quorum for that item and must not vote on any decision affecting their interests.

7.4 Gifts and hospitality

Gifts or hospitality that could reasonably be interpreted as inducements, including hospitality from suppliers or partners involved in tendering or commercial decision making, must be declared and recorded in accordance with the College's arrangements.

7.5 Authorisation of conflicts

Where a conflict arises because an individual owes duties or loyalties to another organisation or person, an unconflicted individual or body with appropriate authority may determine whether it is in the interests of the College to permit the conflict to be managed through agreed mitigations.

7.6 Restrictions on operational authorisation

Individuals must not authorise contracts, payments, or invoices connected with a matter where they have a material conflict of interest.

8. Meetings, records and reporting

8.1 Standing agenda item

Conflicts of interest must be a standing agenda item for meetings of the governing body and its committees.

8.2 Minute keeping

Minutes of any meeting at which a conflict is declared must record:

- The nature of the interest
- A brief outline of the relevant discussion
- The action taken to manage the conflict

8.3 Reporting and oversight

The Policy Owner will report periodically to the governing body, or an appropriate committee, on:

- Completion rates for annual declarations
- Themes and recurring conflicts
- Any significant breaches and remedial actions

9. Training and awareness

The College will provide appropriate guidance and training to ensure individuals understand their responsibilities under this policy.

10. Monitoring and Review

Compliance with this policy will be monitored through:

- Review of the Register of Interests
- Internal audit or governance review, where appropriate
- Periodic reporting to the governing body

This policy will be reviewed at least every two years, or earlier if required by regulatory change.

11. What this means for you

This policy applies if you are involved in making decisions on behalf of the College.

You must:

- Think proactively about whether your external interests, relationships or other roles could affect, or be perceived to affect, your judgement
- Declare interests when you are appointed, every year, and whenever circumstances change
- Declare any relevant interest at the start of meetings, or as soon as you become aware of it
- Follow any agreed actions to manage a declared conflict, including withdrawing from discussion or decision making where required

You must not:

- Take part in decisions where you have a material conflict of interest unless expressly authorised as part of a documented mitigation
- Use your position at the College to obtain personal or third-party benefit
- Authorise contracts, payments or approvals connected to a matter where you have a declared conflict

If you are unsure whether something constitutes a conflict of interest, you should declare it or seek advice from the Governance Office.