CONFLICT OF INTEREST POLICY - STAFF

Purpose & Scope

The establishment of links between College 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 (By-Law VIII). The College has therefore prepared the following guidelines and rules to help individuals assess whether or not proposed activities could cause a conflict of interest, and to outline the procedure for disclosure of any actual or potential conflict.

Policy Statement

Guidelines as to Conflict of Interest

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 Head of Human Resources.

(a) Use of the College's research 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) Involvement in externally funded activity which might infringe the right of a student engaged in the activity to complete the degree for which he or she is registered, and/or to publish freely his or her findings (except in the circumstances referred to in sub-paragraph (b) above).

(d) 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 closely related to that individual's line of research in 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.

(e) 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 University, where the employee has been concerned or connected with placing or negotiating the contract in question or with the research or other activity which the contract might cover.

(f) Application by family members or friends for employment in the College or in a related company, where an individual is in a position to influence the appointing process. (Note: the College operates specific rules on the appointment of close relatives in the same department.)

(g) 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.

Declarations

It is the duty of all employees to disclose any conflict of interest. The procedures for disclosure are explained below. Failure to disclose a conflict of interest may result in disciplinary action.

Application for permission to undertake other activities will require the individual concerned to declare any conflict of interest before permission will be granted. Disclosure should be made in writing and should be directed to the Head of Human Resources. This procedure will also apply in other situations giving rise to a potential conflict of interest. Should a member of staff be unclear as to whether any potential external involvement should be declared, advice should be sought from the Head of Human Resources.

A record of all declarations made by staff shall be maintained centrally by the Head of Human Resources.

Members of staff should inform the Head of Human Resources when their circumstances change and a declaration of interest needs to be declared or amended.

Staff will be reminded annually to declare or amend any register of interest held by Human Resources.

The Head of Human Resources will seek the permission of the Principal should any declarations raise issues of potential conflict.

In addition, a further declaration as to any conflict of interest may be requested by the College at the funding award stage in connection with any externally funded research project.

If a conflict of interest or a potential conflict of interest has been disclosed, the individual concerned shall discuss a possible resolution with the Head of Human Resources.

Members of the Governing body and senior managers complete an annual declaration of interests which is reported annually to the Audit & Risk and the Governance & Search Committees of the Corporation.

The Governance Professional shall keep a record of the declarations of interest for Governors and Senior Post Holders.

Any unresolved matter shall be referred to the Audit & Risk Committee for advice; in cases of particular difficulty the matter shall then be referred to the wider Governing Body.

This policy/procedure has been reviewed regarding the requirement for an Equality and Diversity Impact Assessment and a Privacy Impact Assessment.

At this stage it is felt that a full impact or privacy assessment is unnecessary as the college public duty has been discharged through a related policy/procedure or there is no current requirement.

Document Control		**Linked Policies/Strategies**	**Linked Procedures**
Policy	Conflict of Interest Policy	Gifts & Hospitality Policy Counter Bribery & Fraud Policy Whistleblowing Policy	
Responsibility	Head of Human Resources		
Approval Date	July 2025		
Review Date	July 2027		
Approval Group	Senior Leadership Team		