Conflict of Interest Policy

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1. Introduction

William College is dedicated to upholding the highest standards of integrity, ethical conduct, and accountability across all its operations. This Conflict of Interest Policy is designed to safeguard the College, its staff, and its governing body by ensuring that any actual or potential conflicts of interest are appropriately disclosed and managed.

William College values its partnerships with external organisations and actively encourages all members of the William College community to participate in external engagements. Robust procedures are in place to identify and address conflicts of interest that may arise.

This policy is aligned with the UK Higher Education regulatory requirements, including OfS conditions, the Public Interest Disclosure Act 1998, and Committee of University Chairs (CUC) guidance.

2. Purpose

This Policy aims to:

- Promote transparency and accountability in all College activities.
- Ensure that the interests of senior staff, key decision-makers, and members of the Board of Governors are regularly declared and reviewed.
- Identify and manage actual or perceived financial and non-financial conflicts of interest.
- Protect the College's academic integrity, financial stability, and strategic objectives.
- Ensure compliance with legal, regulatory, and professional standards.
- Prohibit activities where a conflict cannot be effectively managed.
- Enable staff, students, and governors to recognise potential conflicts and understand how to report them.
- Promote awareness and adherence to this Policy across the College community.

3. Scope

This Policy applies to all individuals working for or on behalf of William College, including:

- All employees (full-time and part-time).
- Governors.
- Student Governor.
- Staff Governor.
- Members of College committees.

The following steps should be taken:

- Identify situations where a conflict of interest may exist.
- Declare any actual or potential conflict of interest.
- Manage the conflict appropriately, where required.
- Refrain from activities that cannot be managed without risk to the College's interests.

4. Definitions

A conflict of interest arises when an individual's responsibilities to William College, or to any other body they serve, may be compromised, or perceived to be compromised, by:

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- Personal gain, whether financial or otherwise, to themselves, their family, or close associates.
- Competing obligations to another person or organisation.
- Conflicts may exist in perception even where no actual conflict is present. Individuals must therefore consider how their circumstances or actions might reasonably be viewed by others.

Term	Definition
Conflict of Interest	A situation in which an individual's personal, financial, or professional interests may compromise, or be perceived to compromise, their responsibilities to William College or any other body they serve.
Financial Conflict	A situation where there is, or appears to be, an opportunity for personal financial gain, or gain to close relatives or associates. This may include payments or benefits in kind, equity interests or shareholdings, gifts or hospitality, or intellectual property rights. Any interest that could reasonably be perceived as influencing decisions must be declared, regardless of its value.
Non-Financial Conflict	A situation where personal or professional interests could influence decision-making without involving direct financial gain. Examples include career progression or professional recognition, educational or training opportunities, favouritism in recruitment, promotions, or academic assessment, or benefits to a connected person.
Connected Person	A family member, relative, business partner, or an entity in which the individual holds a financial interest, whose interests may give rise to a conflict. Related parties are defined in accordance with IAS 24 and UK GAAP.
Perceived Conflict of Interest	A situation where, even if no actual conflict exists, a reasonable person could conclude that an individual's personal interests might improperly influence their professional responsibilities.
Register of Interests	The formal record maintained by HR (for staff) and the Secretary to the Board (for governors) in which all declared interests, assessments, and management actions are recorded.
Conflict Management Plan (CMP)	A formal documented plan created where a conflict requires active management, setting out the nature of the conflict, agreed mitigation measures, the responsible monitoring officer, and review dates.
Declaration of Interests	The formal written disclosure made by a member of staff, governor, or other individual within scope, notifying the College of any actual, potential, or perceived conflict of interest.
Senior Staff	For the purposes of this Policy, senior staff are defined as members of the Executive Leadership Team and any other post-holders designated as senior by the CEO. This includes, but is not limited to, Heads of Divisions, the Provost, and any individual with institution-wide strategic or financial decision-making authority. HR will maintain and publish an up-to-date list of roles that fall within this definition.
Gifts and Hospitality	Staff must also be aware that the receipt or offer of gifts and hospitality may give rise to a financial

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	conflict of interest. The acceptance, offer, or refusal of gifts and hospitality must be managed in accordance with the College's Financial Regulations, which set out applicable thresholds and registration requirements. Where any gift or hospitality could be perceived as influencing a decision or creating a conflict of interest, it must be declared in accordance with the College's Financial Regulations, which take precedence in relation to gifts and hospitality thresholds and registration requirements.

5. Policy Statement

This Policy supports good governance and ethical practice and reflects the College's commitment to public interest principles and relevant regulatory expectations, including the CUC guidance.

Key principles include:

- Individuals must avoid situations where personal interests could conflict with the interests of the College.
- A Register of Interests will be maintained for senior staff and members of the Board of Governors.
- Disclosure and management of conflicts will be guided by applicable legal, regulatory, and professional standards.

All conflicts will be assessed using a risk-based framework to determine significance and appropriate management actions.

William College strictly prohibits staff from pursuing or engaging in intimate relationships with students where professional responsibilities may be affected or where the student's academic or social opportunities could be influenced. Any such relationship must be reported immediately in accordance with the Staff-Student Relationships Policy. Safeguards will be implemented, including reassignment of supervisory or advisory responsibilities.

Where an individual becomes aware that another member of staff, governor, or committee member may have failed to declare a conflict of interest, they are encouraged to raise this concern promptly. Such concerns should be reported in accordance with the College's Whistleblowing Policy, which provides a confidential mechanism for raising matters of public interest without fear of detriment. William College is committed to ensuring that all concerns raised in good faith are taken seriously and investigated appropriately.

6. Responsibilities

Department/ Individual	Responsibilities
Human Resources (HR)	Maintain the Register of Interests for staff (including those who sit on committees). Record all disclosures and management actions. Provide guidance to staff and managers on identifying, declaring, and managing conflicts. Support escalation of complex conflicts and ensure compliance with this Policy.
All Staff (including Senior Leadership and Line Managers)	Recognise circumstances where a conflict of interest may arise or could be perceived. Promptly disclose actual or potential conflicts. Seek guidance when uncertain about the application

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	of this Policy. Notify line manager or HR of any changes that may create new or altered conflicts.
Heads of Divisions	Ensure all individuals in their areas are aware of and understand this Policy. Oversee compliance with disclosure requirements. Escalate complex or significant conflicts to the CEO or HR as appropriate
Members of College committees	Declare relevant interests annually via the HR process outlined in Section 7.1 and update whenever new potential conflicts arise. Escalate complex or significant conflicts to HR in writing or at the beginning of a committee meeting to the Chair and Secretary.
Board of Governors	Declare relevant interests prior to appointment and update annually or when material changes occur. Disclose conflicts affecting Board decisions immediately to the Chair or Secretary to the Board. Recuse from discussions or votes where personal or connected interests exist. Ensure all significant or complex governor conflicts are reviewed by the Audit, Risk and Finance Committee. Ensure all Board-level conflicts and management actions are recorded in the Register of Interests.
Student Governor and Staff Governor	Identify circumstances where their personal, academic, or external interests could influence, or be perceived to influence, committee discussions or decisions. Declare actual or potential conflicts to the committee chair at the earliest opportunity. Withdraw from relevant discussions or votes where instructed by the Chair. Maintain confidentiality and uphold the integrity of committee processes. Notify the Chair of any changes that might create new or altered conflicts of interest.
Secretary to the Board	Maintain the Register of Interests for governors. Record all Board-level disclosures and management actions. Provide guidance to governors on identifying, declaring, and managing conflicts. Support escalation of complex conflicts and ensure compliance with this Policy.

7. Procedure

7.1 Declaring Conflict of Interest – Staff

Staff must disclose any actual, potential, or perceived conflict of interest as soon as it arises. Disclosures should be made in writing to HR. HR will assess disclosures and management actions may include:

- Developing a Conflict Management Plan.
- Recusal from decision-making.
- Referral of decisions to another party.
- Withdrawal from relevant activities.
- Recording of gifts or hospitality in accordance with the College's Financial Regulations.

All disclosures and actions must be recorded in the Register of Interests maintained by HR.

In addition to ad hoc disclosures, all staff within scope are required to complete an annual declaration of interests. HR will issue annual declaration forms at the start of each academic year. Staff must return completed forms to HR within 20 working days of issue, regardless of whether their interests have changed. Where no changes have occurred, staff must confirm this in writing. HR will record all annual declarations in the Register of Interests and follow up with any individual who fails to return their form within the required timeframe.

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7.2 Declaring Conflict of Interest – Board of Governors

Governors must disclose all actual, potential, or perceived conflicts of interest in writing to the Chair or the Secretary to the Board. If either has a personal interest, the disclosure must be escalated to the Chair of the Audit, Risk and Finance Committee.

Prior to appointment, governors must complete a Declaration of Interests form and are required to update this annually, or sooner where circumstances change. At the start of each Board or committee meeting, the Chair will invite governors to declare any interests relevant to agenda items; all such declarations must be formally recorded in the minutes by the Secretary to the Board.

All disclosures will be acknowledged in writing by the Secretary to the Board within five working days of receipt, or prior to the next scheduled Board or committee meeting, whichever is sooner. The Secretary to the Board will carry out an initial review of each disclosure and risk assess it having regard to the nature and extent of the interest, the individual's proximity to relevant decision-making, the potential impact on the College, and any reputational considerations. Where a disclosure is assessed as significant or complex, it will be referred to the Audit, Risk and Finance Committee for independent oversight and determination. The governor will be informed in writing of the outcome of the assessment, including any management actions required, within five working days of the assessment being completed.

Following assessment, disclosures will be categorised as follows:

- **Low**: manageable with disclosure only, no further action required. The governor will be notified accordingly and the declaration recorded in the Register of Interests.
- **Medium**: mitigation measures required before the governor may continue to participate in discussions or decisions relating to the matter. The governor will be notified of the specific measures to be put in place and must confirm agreement in writing.
- **High**: the conflict requires restriction or prohibition of the governor's involvement. Cases in this category will be referred to the Audit, Risk and Finance Committee. The governor will be informed of the outcome and any restrictions on their participation as soon as practicable following the Committee's determination.

Where a conflict is identified, management actions may include withdrawing from discussion, abstaining from voting, referring the matter to another committee, or recording the conflict in the Register of Interests.

7.3 Assessment, Ownership and Follow-Up of Disclosures - Staff

This section sets out the assessment process for staff disclosures. The equivalent process for governor disclosures is set out in Section 7.2.

HR is responsible for reviewing all staff disclosures. Where necessary, advice may be sought from the CEO, the Audit, Risk and Finance Committee, or external legal or regulatory advisors.

Each disclosure will be acknowledged in writing within five working days of receipt, then risk assessed according to the nature and extent of the interest, proximity to decision-making authority, potential impact on the College, and reputational risk. The member of staff will be informed in writing of the outcome of the assessment, including any management actions required, within five working days of the assessment being completed. Disclosures will be categorised as Low (manageable with disclosure only), Medium (requires mitigation), or High (requires restriction or prohibition).

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A named responsible officer (e.g. line manager, HR representative, or Board Secretary) will be assigned to each case and will be accountable for agreeing and implementing management actions, monitoring compliance, and acting as the primary contact for the individual.

7.4 Conflict Management Plans

Where a conflict requires active management, a formal Conflict Management Plan (CMP) must be created. The CMP will clearly document the nature of the conflict, specify agreed mitigation measures (e.g. recusal, reassignment of duties), identify the responsible monitoring officer, and define review dates. The individual must confirm agreement to the plan in writing.

7.5 Monitoring and Review

All declared conflicts are subject to ongoing monitoring and periodic review. Line Managers monitor day-to-day compliance for staff conflicts. HR and the Secretary to the Board maintain oversight of all recorded conflicts and ensure actions are implemented and documented. The Audit, Risk and Finance Committee reviews high-risk or complex cases for governors and strategic risks.

Conflicts must be reviewed at least annually, when circumstances change, or when triggered by audit or governance review. Outcomes of reviews must be recorded in the Register of Interests.

7.6 External Employment and Work for Other Higher Education Providers

William College recognises that academic staff may engage in external teaching, assessment, consultancy, or research activities with other higher education institutions. Such activity can support professional development and strengthen sector relationships; however, it may also create actual or perceived conflicts of interest.

A conflict may arise where external work overlaps with the staff member's duties at William College, creates competing commitments that could affect availability, performance, or impartiality, involves access to confidential information, intellectual property, or commercial interests, provides financial or professional benefit that could influence decision-making, or creates a perception of divided loyalty between William College and another institution.

External work should generally not exceed 20% of contracted hours unless approved in writing. Staff must declare all external teaching, examining, consultancy, or research engagements with other higher education providers, regardless of whether the work is paid or unpaid. Declarations must be submitted in writing to the Head of Division or line manager, as appropriate, before the activity begins. Where external work is ongoing or recurring (e.g. annual external examining), staff must update their declaration annually or whenever circumstances change.

Management actions may include approving the activity with conditions, limiting the scope or timing of the external work, reassigning internal duties to avoid conflicts, or prohibiting the activity where the conflict cannot be effectively managed.

Failure to declare external work that creates a conflict of interest may constitute misconduct and may be subject to disciplinary action, following the Staff Disciplinary Policy and Procedure.

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7.7 Managing Conflicts of Interest

Conflicts vary in seriousness and relevance. When assessing a conflict, individuals should consider the significance of the interest, how closely the interest relates to the decision or activity, whether the individual could influence the outcome, and the importance of the decision to the College.

Conflicts may be managed through stepping out of discussions or decisions, remaining for discussion but not participating in the decision, assigning the decision to another individual, placing financial interests in trust, issuing a formal declaration of interest, or withdrawing from the project or activity entirely.

7.8 Escalation of Non-Compliance

Where a conflict is not declared, agreed actions are not followed, or a conflict escalates in risk, the matter will be escalated to HR, the CEO, or the Board as appropriate, and investigated in line with relevant disciplinary or governance procedures.

Failure to comply may result in removal from decision-making responsibilities, formal disciplinary action, or termination of role where appropriate.

7.9 Record Keeping and Audit

All disclosures, assessments, decisions, and management actions must be recorded in the Register of Interests and retained in accordance with data protection and records management requirements. The Register will be subject to periodic internal audit and oversight by relevant governance committees.

8. Training and Communication

William College will promote awareness and adherence to this Policy across the College community. All individuals within scope are expected to familiarise themselves with this Policy and seek guidance where uncertain.

Heads of Divisions are responsible for ensuring all individuals in their areas are aware of and understand this Policy. Where a line manager is not a Head of Division, they are responsible for ensuring compliance within their own team and escalating any concerns to their Head of Division as appropriate.

9. Policy Review

This policy is reviewed annually by the Audit, Risk and Finance Committee, or earlier if required by regulatory change. Any amendments require the approval of the Board of Governors.

10. Related Policies and Documents

- Staff-Student Relationships Policy
- Staff Disciplinary and Malpractice Policy and Procedure
- Financial Regulations
- Whistleblowing Policy
- Committee of University Chairs (CUC) Higher Education Code of Governance
- Public Interest Disclosure Act 1998

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- IAS 24 (Related Party Disclosures)
- UK GAAP

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11. Appendix A - Examples of Conflict of Interest

Conflict of interest examples provided are illustrative only and do not constitute an exhaustive list of all possible situations.

Situation	Declaration	Possible Management Strategy
Teaching and/or supervision-related A staff member who has a close personal or familial relationship with a student or a person connected to the student and who may be involved in decisions about the student's admission, supervision or academic progress.	To the Provost or a senior member of the HR Team.	The student will be made aware of the disclosure and arrangements will be put in place to avoid the staff member having any professional connection with the student.
HR-related A staff member who would normally be involved in the selection process for a new appointment learns that a close family member is applying for the role.	HR/Recruitment team.	No member of staff may be involved in the recruitment process where a relative is a candidate. Therefore, the staff member's role in the selection process should be carried out by another member of staff.
Committee-related a) External committee member who advises or sits on committees at other universities. b) A committee member who has an outside interest in an item on the agenda.	To HR for staff register of conflicts of interests, Secretary for governors' register of conflict of interests, and Chair of Committee or delegate (when the conflict relates to a particular agenda item).	a) Membership of other bodies which could constitute a conflict of interest should be recorded in the College's register of conflicts of interests. b) The individual should declare specific conflicts at the start of meetings when relevant. The Chair should decide what action may be necessary, which may include the conflicted member: • Absenting themselves from the discussion and decision of the item. • Remaining for the discussion but not the decision on the item. • Remaining for full item but not participating in the decision. The conflict and action should be minuted.
Finance-related A staff member who takes part in the negotiation of a contract between the College and a supplier where they, or a person connected to them, has a financial or non-financial interest in that supplier.	To HR (for register of conflicts of interests) and Finance Manager (financial controller).	The employee should declare the conflict prior to engaging the supplier, so that HR can update the register of conflicts of interests and the Finance Manager pre-authorise the engagement and/or expenses, if they are deemed appropriate.

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12. Appendix B – Conflict of Interest Declaration Form: Staff

Personal Details

- Name:
- Job Title:
- Department:
- Line Manager:
- Email Address:

Type of Declaration (Select one)

- New declaration ☐
- Update to an existing declaration ☐
- Annual declaration ☐

Description of the Conflict of Interest

Please provide full details of the actual, potential, or perceived conflict of interest. Include relevant dates, organisations, individuals involved, and any financial or non-financial interests.

Details: Click or tap here to enter text.

External Employment or Engagements

(Complete if applicable)

- Name of external organisation:
- Nature of work (e.g., teaching, examining, consultancy, research):
- Is the work paid or unpaid?
- Estimated time commitment:
- Does this activity overlap with your duties at William College?
  Yes ☐
  No ☐

If yes, please explain: Click or tap here to enter text.

Connected Persons

Does the conflict relate to a family member, partner, close associate, or an organisation in which you or a connected person has an interest?

Yes ☐
No ☐

If yes, provide details: Click or tap here to enter text.

Declaration

I confirm that the information provided is accurate and complete to the best of my knowledge. I understand that failure to declare a conflict of interest may constitute misconduct.

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Signature:
Date:

HR Review

(To be completed by HR with discussion from the line manager)

- **Conflict reviewed** (include date of review)**:**
- **Recorded in Register of Interests:** ☐
- **Management actions:** Click or tap here to enter text.
- **Management actions agreed:** Click or tap here to enter text.
- **Escalation required:**
  No ☐
  Yes ☐ — escalated to:
  Head of Division ☐
  CEO ☐
  Audit, Risk and Finance Committee ☐
  Board of Governors ☐

HR Signature:

Line Manager Signature:
Date:

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13. Appendix C – Conflict of Interest Declaration Form: Governors

Personal Details

- Name:
- Role on the Board:
- Committee Memberships:
- Email Address:

Type of Declaration (Select one)

- Pre-appointment declaration ☐
- Annual declaration ☐
- Update to an existing declaration ☐
- Declaration relating to a specific agenda item ☐

Description of the Conflict of Interest

Provide full details of the actual, potential, or perceived conflict. Include relevant organisations, financial or non-financial interests, connected persons, and any roles held.

Details: Click or tap here to enter text.

Financial Interests

(Examples: shareholdings, payments, contracts, consultancy, property interests)

- None ☐
- If applicable, provide details: Click or tap here to enter text.

Non-Financial Interests

(Examples: trusteeships, advisory roles, memberships, personal relationships, external appointments)

- None ☐
- If applicable, provide details: Click or tap here to enter text.

Connected Persons

Does the conflict relate to a family member, partner, close associate, or organisation connected to them?

- Yes ☐
- No ☐

If yes, provide details: Click or tap here to enter text.

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Declaration for Meeting-Specific Conflicts (Complete only if relevant to a Board or committee meeting)

- Meeting date:
- Agenda item(s) affected:

Declaration

I confirm that the information provided is accurate and complete. I understand my obligation to declare conflicts promptly and to withdraw from discussions or decisions where required.

Signature:
Date:

Secretary to the Board Use Only

- Recorded in Register of Interests: ☐
- Date recorded:
- Risk Categorisation
  Low ☐
  Medium ☐
  High ☐
- Referred to Audit, Risk and Finance Committee
  Yes ☐
  No ☐
- Date Referred:
- Outcome of assessment:
- Management actions required:
- Governor informed of outcome:
  Yes ☐
  Date:
- Governor confirmed agreement to management actions:
  Yes ☐
  Date:
- Reviewed by:

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