



ST. HUGH'S COLLEGE, OXFORD

## **UNDERGRADUATE ADMISSIONS CONFLICT OF INTEREST POLICY**

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## Undergraduate Admissions Conflict of Interest Policy

1. In Michaelmas Term of each academic year, the Admissions Coordinator will remind all persons conducting interviews on behalf of St Hugh's, whether Fellows, Lecturers, or any others (henceforth 'interviewers'), that all actual or potential conflicts of interest must be declared in writing to the Tutor for Admissions.
2. Examples of possible conflicts are given below – this is not an exhaustive list.
3. Any interviewer who is aware of such a conflict, or considers that one might arise, must send details in writing to the Tutor for Admissions as soon as they become aware. Even if they are uncertain about whether there is in fact such a conflict, interviewers should supply these details.
4. The Tutor for Admissions is required to adhere to this policy even when not an interviewer, as are any other College Officers or members of the administrative staff directly involved in admissions decisions or their processing.
5. Interviewers should NOT communicate these details to any other person, including fellow interviewers. The Tutor for Admissions will share them only as necessary.
6. When any conflict of interest is declared, the Tutor for Admissions will meet with the interviewer to discuss the situation, assess the level of risk, and agree any action that may be required. The Tutor for Admissions may need to consult with others, including the Principal, in some cases. If the Tutor for Admissions is conflicted, the Principal will have these discussions and recommend action.
7. Action taken is at the discretion of the Tutor for Admissions after necessary consultation: where a conflict is low-level or distant, it may be that awareness of it is sufficient to ensure fairness; in some cases interviews will need to be moderated by an external party; in others it may be necessary to remove an interviewer from an interviewing team for a particular interview; in some cases it may be necessary to remove an interviewer from all interviews in a given cycle. There is a range of other possible actions.
8. The Tutor for Admissions will record both the nature of the conflict of interest and the action proposed and store this record securely.
9. The Tutor for Admissions will make a report to Academic Committee each Hilary Term outlining the number and type of conflicts of interest declared during that year's admissions round and the actions taken to manage them. This report will not contain any confidential information and will not reveal the names of students or tutors or the academic disciplines or degree programmes concerned.
10. The information provided will not be used for any purpose other than to record and report conflicts of interest in the manner outlined above. The report to Academic Committee or elements from it may be shared within the University for the purposes of data collection or

quoted in an appropriate manner to satisfy legitimate freedom of information requests. Any such sharing will also be fully anonymized.

## **What might constitute a conflict of interest?**

The list here is not exhaustive. If there is any doubt, please consult the Tutor for Admissions.

There is prima facie a conflict of interest if:

- an interviewer is a relative or friend of a candidate or has close connections with a candidate's family
- someone closely connected to an interviewer – whether a relative or a College/Departmental colleague – is also connected to a candidate or a candidate's family
- an interviewer has, or has had, a formal role, paid or unpaid, with a candidate's school or other education provider (e.g. as a governor, council member, teacher, former pupil) – College- or Department-organized outreach visits do not in themselves constitute a conflict of interest
- an interviewer has a formal role, paid or unpaid, with an organization advising applicants on university applications – this includes so-called 'crammers' and all other commercial or charitable university preparation organisations
- an interviewer knows that a candidate is connected with a donor to or benefactor of the College, past, present, or potential.

## APPENDIX

### University guidance note on Conflicts of Interests affecting academic staff concerned with undergraduate admissions in Colleges

1. The following broad categories of actual or perceived conflicts of interest involving academic staff exercising judgements on which admissions decisions are based could arise in practice:

- i. **Personal** – e.g. the candidate is a relative or friend, or the relative of a friend or colleague.
- ii. **Institutional** – e.g. the candidate is a student at a school where the tutor has a formal role in the operation of the school (e.g. as a governor), or where a teacher or governor is a relative or friend, or where the tutor has another significant association (e.g. in promoting the school as an active member of an Old Boys'/Girls' Association).
- iii. **A teaching Fellow's role as trustee** – the candidate is connected with an individual who is known to the tutor as a benefactor or other significant friend to the College.

It should be noted that many tutors and others will have perfectly proper dealings with schools and prospective applicants throughout the year as part of their admissions and access/outreach work, and a process for recording and discussing actual or potential conflicts of interest is in no way intended to restrict these proper activities, or to prevent a tutor from being involved with the admission of students from schools with which they have conducted outreach work.

2. Tutors responsible for admissions have always had to face the possibility of these types of conflict of interest. They will take care to prevent such things affecting their academic judgment. It is understood that many colleges already operate a procedure for staff to declare, often annually, in general terms any conflicts of interest they may face. But while some Colleges may have in place a procedure for the declaration of admissions-specific interests, others currently do not.

3. Transparency is important in any area where rules not only apply but have to be seen to be in operation. But in this instance, the onus laid on tutors to declare will also:

- a) Remind them of the need to bear in mind what may be perceived as biases, and to consult with the appropriate person(s) in College any concerns they might have; and
- b) Ensure that adequate action is taken, e.g. where both Tutors in an interviewing pair are affected, that alternative arrangements are made for conduct of that particular interview.

4. It is suggested that Colleges should

- a) Consider providing staff who face what may be perceived as a conflict with the opportunity formally to discuss this with the Tutor for Admissions (or other appropriate and designated College official), to agree the seriousness or otherwise of the conflict and any action required, and to record both the nature of the conflict of interest and

any agreed action taken, as part of the admissions process (in addition to those which are recorded, in general terms, by colleges about their Trustees); and

- b) Ensure that a brief report should be provided ex post with regard to each of the declared conflicts indicating how it was handled.

- 5. A conflict involved in admissions may be considered to be minor and/or for example be declared to fellow-interviewers. But it would still seem to be appropriate that as part of the admissions procedure it should be recorded.