



Conflicts of Interest Policy

1. Why the College has a Policy

Conflicts of interest may arise where an individual's personal or family 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. What to do if a Conflict of Interest arises

Whenever a member of Governing Body, staff or student has a personal interest in a matter to be discussed at a meeting of the College or in a prospective commercial or financial dealing with an outside body, the individual concerned must, in the case of matters arising at meetings:

- declare an interest as or before discussion begins on the matter;
- withdraw from the meeting for that item unless expressly invited to remain in order to provide information;
- not be counted in the quorum for that part of the meeting;
- withdraw during the vote and have no vote on the matter.

In other dealings where individuals are acting on their own or in collaboration with others outside the context of a meeting, before concluding any arrangement, the matter must be discussed with an appropriate College Officer, line manager or common room representative.

It is an individual's responsibility to raise concerns relating to conflicts of interest directly with an appropriate person within the College. If not sure what to declare, those affected should err on the side of caution and consult at the earliest possible occasion. If a conflict of interest cannot be resolved by discussion the College will set up a panel to advise the parties.

More specific advice for Fellows, staff and students is set out in the attached appendices.

3. Data Protection

Any information provided will be processed in accordance with the principles as set out in the General Data Protection Regulation 2018. 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 St Hugh's College. The information provided will not be used for any other purpose.

Approved by Governing Body

4 December 2019

APPENDIX 1 – Tutors and Fellows

1. All members of the Governing Body, who are treated by statute as charity trustees, have a paramount legal obligation to act at all times with the utmost good faith and in the best interests of the College (the charity) and in accordance with its governing documents (its Statutes and by-laws) as well as ensuring that the College acts in accordance with the general law.

2. It is recognised that those Fellows who are also employees of the University may on occasion have to make decisions where the interests of the College and the University are to a degree opposed. But the College operates as a college of the University and while Fellows must always bear in mind that voting in Governing Body as Fellows requires them to give special and sometimes paramount weight to the interests of the College, they must also bear in mind that there is a substantial community of interest between the College and the University and mention of 'conflict' must always take account of this special context. The College pursues its educational aims within the University of Oxford. Therefore, the *University's Policy on Conflict of Interest*, and the Compliance webpages should also be consulted:

https://researchsupport.admin.ox.ac.uk/sites/default/files/researchsupport/documents/media/statement_of_policy_and_procedure_on_conflict_of_interest_july_2019.pdf

<https://compliance.admin.ox.ac.uk/conflicts-of-interest#collapse1079256>

3. Admissions and Recruitment - Any tutor involved in student admissions should make known to the Senior Tutor and Admissions Coordinator any conflict of interest as soon as it arises. This includes prior personal or teaching knowledge of candidates, or relationship with third-party agencies. Tutors should not make decisions about applicants who are known to them.

4. Charity Commission Guidance - The publication CC29 – **Conflicts of Interest a guide for Charity Trustee** – issued in May 2014 provides useful help and information. Members of Governing Body are encouraged to read the guide.

5. The Declaration of Conflicts of Interest - Members of Governing Body are required to declare interests which might conflict with their duty of loyalty to the College, and also any gifts or hospitality received in connection with their role in St Hugh's College which might conflict with that duty. For the avoidance of doubt, this excludes the receipt of honorariums and/ or hospitality associated with giving lectures at conferences/seminars unless this creates a direct conflict with the College. The Finance Bursar should be notified promptly of the receipt of any gifts or hospitality of a value over £100 received by any member of Governing Body.

APPENDIX 2 - St Hugh's College Staff

Conflicts of interests can be financial and non-financial, and a potential gain can be personal or a benefit to someone with a connection to a member of staff. The issue is not the integrity of the member of staff concerned, but the management of any potential to be influenced by conflicting loyalties. Even the appearance of a conflict of interest can damage reputation, and so conflicts need to be managed carefully.

The following information provides guidance on the identification and subsequent management of actual, perceived or potential conflicts of interest that may be encountered by members of St Hugh's staff. Further information can be found in the Employee Handbook and HR Manual.

1. Recruitment of new staff

Staff involved in the recruitment and selection process must immediately declare to the HR Office any conflict or potential conflict of interest, at which point in the interests of fairness to all candidates they will not be permitted to continue to participate. For example, it would not normally be appropriate for a member of staff to be a member of a recruitment panel where an applicant is a member of their spouse's family. Members of staff can seek confidential guidance from the HR Office or the Bursar.

2. Relationships involving a supervisor or line manager

It would normally not be appropriate for members of staff to be involved in managerial activities relating to the member of staff with whom they have a relationship, for example:

- Authorisation of financial payments or expenses
- Salary payments
- Recruitment, selection or appointment including the provision of references
- Probation, progression, and promotion

3. Relationships between members of staff and suppliers

Where members of staff have personal relationships with consultants, contractors or suppliers who provide goods or services to the College, and they are in a position to influence contracts or the tendering process, such personal relationships must be disclosed to the member of staff's manager in good time. The manager must consult the Bursar, who will determine whether the member of staff should take any part in agreeing the contract. This duty of disclosure applies equally to any renewal or extension of contracts.

4. Private work

Members of staff may undertake private work in their own time but this must not impair the performance of the member of staff's duties nor conflict with the interests of the College. Before accepting any work or extending any existing private work members of staff are encouraged to contact their line manager. Under no circumstances shall materials (printed or otherwise) bearing the College's name, address, letter heading or crest be used in connection with private work.

5. Gifts, vouchers, points or payments from suppliers

Gifts, vouchers, air-miles, travel discounts, loyalty products and points, or payments received personally by any member of staff from suppliers or their agents **as a result of a College purchase** belong to the College rather than to the person placing the order, and must be disclosed immediately to the Bursar. For the avoidance of doubt, low value items (**below £10**) such as calendars, diaries, pens and mugs may be retained without disclosure. In addition, members of staff should disclose to the Bursar any preferential prices or discounts offered by suppliers when purchasing goods or services on behalf of the College.

6. Hospitality from suppliers

Hospitality of a value over £50 received by any member of staff should be disclosed to the Bursar.

7. Relationships between staff and students

The College values good professional relationships between staff and students; these relationships depend upon mutual trust and respect. Staff are reminded of the College's Sexual Harassment Policy which states that, 'any member of staff found to be engaging in a romantic or sexual relationship with a student for whom they have teaching, professional or pastoral responsibility ... will be subject to disciplinary action, which may result in dismissal.'

The above list is not exhaustive and there may be other occasions which may pose a real or perceived conflict of interest. Staff have a responsibility to use their judgement and if in doubt discuss the issue with their line manager, the HR Office or Bursar.

College Disciplinary Procedures

Failure to follow the guidance set out in this policy will be considered a serious matter and may lead to disciplinary action under the College's disciplinary procedures for staff.

APPENDIX 3 - Students

1. The University's Conflict of Interest policy, approved by the University Council, requires that all students [and University staff] are required to recognise and disclose activities that might give rise to conflicts of interest or the perception of conflicts and to ensure that such conflicts are seen to be properly managed or avoided.

The University's '**Conflict of Interest Policy**' and '**Summary of Policy and Procedures on Conflict of Interest**' can be found at: <https://researchsupport.admin.ox.ac.uk/governance/integrity/conflict>

2. St Hugh's students are also required to declare those interests which might conflict with their duty of loyalty to the College in connection with their role in St Hugh's. For example, a student should disclose a conflict of interest if they are negotiating a contract for a student event in the College and the service provider is owned by a family member or a personal friend. Students can seek confidential guidance from the Bursar.

3. Gifts, vouchers, points or payments received personally by any students from suppliers or their agents as a result of a **purchase** in connection with their **role in St Hugh's College** must be disclosed immediately to the Bursar in the first instance.

4. Hospitality of a value over £50 received by any student in connection with their role in St Hugh's College should be disclosed to the Bursar. For the avoidance of doubt, this excludes the receipt of honorariums and/or hospitality associated with giving lectures or presentations at conferences/seminars.