

Hull College Group Policy	Procedure Status: Approved	 Hull College Group
Title: Conflicts of Interest Policy	Ref: G1.19	Page 1 of 3
Key Policy underpinning the Group's commitment to the management of conflicts of interests at Corporation		Next review date: August 2019

## 1. Policy Introduction

1.1. It is the policy of Hull College Group Corporation ("the Corporation") that all Governors and Co-Opted members of the Corporation attending Corporation and/or Corporation committee meetings must keep to the absolute minimum all unavoidable conflicts of interest between the interests of the Corporation on the one hand and the personal, professional and business interests of the Governors or Co-Opted member concerned, and of persons connected with them, on the other. This includes avoiding as far as possible perceptions of conflicts of interest, as well as potential and actual conflicts of interest.

The purposes of this policy are:

- 1.1.1 To protect the integrity of the Corporation's decision-making process;
- 1.1.2 To enable all outside parties dealing with the Corporation to have confidence in the Corporation's integrity;
- 1.1.3 To protect the integrity and reputations of the Corporation's Governors and Co-Opted members.

## 2. Responsibility and Implementation

This conflicts of interest policy will be reviewed on an annual basis at the first meeting of the Corporation in the academic year or more frequently should circumstances change.

## 3. Policy Details

### 3.1 Disclosure of interests

3.1.1 All Governors and Co-Opted members of the Corporation are required to make a full written disclosure of any business or personal relationships held, financial or property interests held, or gifts or hospitality received, that could potentially result in a conflict of interests. A declaration of interests form is provided and must be used for this purpose. Any question about whether a Governor or Co-Opted member has an interest which should be disclosed should be referred in the first instance to the Clerk for a determination.

3.1.2 Written disclosures will be kept on a register maintained by the Clerk to the Corporation and all Governors and Co-Opted members will be required to update their disclosure as and when their circumstances change. All disclosures will be reviewed on an annual basis at the beginning of each fiscal year. The register will be accessible by Governors and the Corporation's internal and external auditors.

### 3.2 Organisation of meetings where a Governor has disclosed an interest

3.2.1 Where a Governor or Co-Opted member has previously disclosed an interest and the Chair or Clerk is satisfied that the

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interest is relevant to an item on the agenda for a meeting of the Corporation or of a Corporation committee, the Governor or Co-Opted member concerned may not be sent the papers in respect of that item.

### 3.3 Management of conflicts of interest in meetings

3.3.1 In the course of meetings of the Corporation or a Corporation committee and all other activities, all Governors and Co-Opted members will be required to disclose any interests they have in a transaction or decision where they, their family, their employer or their close business or other associates will or may receive a benefit or gain or they have any other interest of a type identified by the Corporation.

3.3.2 If there is a failure to declare an interest that is known to the Chair of Corporation and/or the Chair of the committee or of any such meeting/person responsible for organising such activities and/or the Clerk to the Corporation, the Chair of Corporation or other such person or the Clerk will declare that interest.

3.3.3 After disclosure of any such interest in the case of a meeting, the Governor or Co-Opted member concerned will be asked to leave the room (unless expressly invited to remain, possibly in order to provide information on the matter in hand) whilst the matter is discussed. The Governor will not be counted in the quorum for that part of the meeting and will not be permitted to vote on the question. In the case of all other activities, the Governor or Co-Opted member concerned will not be permitted to participate in the consideration or discussion of the matter other than to disclose his or her conflict of interest.

3.3.4 All decisions of the Corporation or committee made following the declaration of a conflict of interest will be reported in the minutes of the meeting. The report will record:

- 3.3.4.1 the nature of the conflict;
- 3.3.4.2 an outline of the discussion;
- 3.3.4.3 the actions taken to manage the conflict;

Where a Governor or Co-Opted member benefits from any such decision, this will (if the Corporation's auditors advise this to be necessary) be reported in the annual report and accounts in accordance with relevant accounting requirements.

### 3.4 Failure to disclose a relevant interest

3.4.1 The decision of the Chair as to whether a Governor or Co-Opted member has failed to disclose a relevant interest shall be final. Failure to disclose a conflicting interest may lead to a Governor

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or Co-Opted member being in breach of the Corporation's Code of Conduct as well as of this policy. It may also result in the Governor being subject to legal action and personal liability for breach of trust. Such breaches may lead to the Corporation considering the possibility of terminating the Governor's governorship of the Corporation. Any such breaches by a staff Governor may lead to disciplinary action being taken under the College's staff disciplinary procedures.

### **3.5 Data Protection**

3.5.1 The information provided in disclosures will be processed in accordance with the data protection principles set out in the Data Protection Act 1998. Data will be processed only to ensure that Governors and Co-Opted members act in the best interests of the Corporation. The information provided will not be used for any other purpose.

### **4. Related documentation**

**None**

### **5. Policy checklist**

Senior Manager	Lottie Thompson, Executive Director Governance & Compliance
College Committees	Corporation
Corporation Committees	Corporation
Date of next policy review	August 2019
Date Equality Impact Assessment agreed	June 2015

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