

Conflicts of Interest Policy

Effective date: 4 December 2024

Last reviewed/updated: December 2024

Next review date: December 2027

Policy owner: Bursar

Approved by: Governing Body

1. Purpose

- **Objective:** this policy outlines the principles and procedures that apply to conflicts of interest at St Antony's College.

As a registered charity, the College has a legal obligation to act in the best interests of the institution and its beneficiaries. In accordance with the Charities Act 2011 and Charity Commission guidance (CC29), the College is committed to identifying, declaring, and managing conflicts of interest to uphold its charitable purposes. This includes managing actual, potential, or perceived conflicts of interest to ensure integrity and transparency.

In addition to the general obligation for all charities, in a large and complex collegiate University where Fellows, students, and staff hold multiple roles and external relationships may be many and varied, conflicts of interest are bound to arise. This policy is therefore crucial for public trust and for promoting transparency and accountability by ensuring that any potential conflicts are declared and managed openly. It helps to maintain the trust and confidence of donors, beneficiaries, and the general public by demonstrating that the College operates ethically and transparently.

- **Scope:** this policy applies to all members of the College, including but not limited to Governing Body Fellows, members of committees which report directly to Governing Body, staff, students, and College Members.

2. Definitions and Examples

- **Key terms:** a conflict of interest arises when your duties to the College compete with your personal interests or your duties to other people or organisations. Conflicts may be:
 - **Actual:** a real, existing conflict
 - **Potential:** a situation that could develop into a conflict
 - **Perceived:** a situation that an outsider might reasonably view as a conflict.

- **Examples:** conflicts of interest may arise in various contexts, including but not limited to:
 - **Personal Relationships:** Involvement in the appointment, supervision, or assessment of a contractor, supplier, casual worker, consultant or employee with whom you have a close personal relationship. *For example, this could include:*
 - *appointing a contractors, supplier or casual worker who is also a family member*
 - *serving on a panel that is asked to make decisions about awarding studentships to students where one of the applicants is your supervisee*
 - *offering hospitality to a close associate at the College's expense*
 - *recommending a partner organisation for a project where a close family member holds a senior role (even if there is no financial benefit).*
 - **Financial Interests:** Holding a financial stake in, or receiving funding from, a company that contracts with the College or is the subject of research. *For example, this could include:*
 - *serving on the board of a funding body of grant-maker that is considering funding activity at the College*
 - *receiving a gift or hospitality from an organisation external to the College either in a personal capacity, or if the gift may place you in a real or perceived conflict of interest situation, or if the gift is material.*
 - *Please also see the below extract concerning gifts from current/prospective students.*
 - **External Activities:** Engaging in outside employment or consultancy work that may compete with or detract from your commitments to the College. *For example, this could include:*
 - *taking on additional paid or voluntary work which required you to give time to the activity during your normal working hours for the College.*
 - **Governing Body Memberships:** Serving on boards or committees of other organisations that may have interests conflicting with those of the College. *For example, this could include:*
 - *chairing a University committee which is to consider the allocation of funds to be shared between colleges, including St Antony's.*

The College adheres to the University policy governing [gifts from families of current and prospective students](#). The most relevant extracts include that we:

- Do not actively solicit donations from a prospective student or any close member of their family (as defined above) during the period in which an application is live, or likely to become live.
- Do not solicit or accept donations of £500 or more from current students.

3. Policy statement

College members must act with the highest level of integrity and in the best interests of the College. Any situation that could lead to a conflict of interest must be disclosed promptly and managed appropriately in line with the procedures below.

4. Responsibilities

In order to identify potential conflicts of interest, you should consider who you are acting for in any given scenario, and whether there are any competing motivations or interests that could influence you, or be seen to influence you. You must take personal responsibility for identifying and declaring any conflicts of interest, whether real, potential, or perceived, as soon as they arise.

- **Specific Provisions:**

- **Disclosure:** you must disclose any actual, perceived, or potential conflicts of interest as soon as they arise.
- **Recusal:** you must recuse yourself from decision-making processes where a conflict of interest exists or could reasonably be perceived to exist.
- **Confidentiality:** declarations will be handled confidentially and shared only with those who need to know for managing the conflict.
- **Review and Monitoring:** Disclosed conflicts will be reviewed by the Bursar and/or Warden (with the support of MET if required), and appropriate measures will be taken to manage or eliminate the conflict. Regular monitoring and audits may be conducted to ensure compliance with this policy.

5. Declaration procedures

To declare a conflict of interest during the course of **day-to-day business**, you must take the following action as soon as the conflict or potential conflict is identified:

- **Fellows and College Members** should write to the Bursar at bursar@sant.ox.ac.uk
- **Staff** should speak to their line manager, who can take advice from the Bursar as required
- **Students** should write to the Head of the Academic Office at head.academic@sant.ox.ac.uk.

Please include a description of the conflicting interests, any actions already taken to mitigate the conflict, and a proposal for managing it moving forward.

Declared conflicts will be recorded in the Declaration of Interests Register.

You must declare all **gifts** of a value of £50 or more to the Bursar by emailing bursar@sant.ox.ac.uk within 7 days of receipt. All gifts received will be logged in a Gifts Register, which is available for review by the Governing Body.

In addition to gifts, any **offer of hospitality** that could be perceived as influencing College decisions must be declared to the Bursar as above (for example, offer of hospitality overseas when engaging in international collaborations).

Annually, all members of the College's Governing Body and the Senior Administrative Officers are required to complete a [Declaration of Interests form](#).

During committee meetings (including Governing Body), all interests must be declared at the start of the meeting, unless they have been disclosed in advance by writing to

warden@sant.ox.ac.uk. Those with a conflict must withdraw from discussion of the relevant item(s) by leaving the room, unless expressly invited to remain for the sole purpose of providing information. All interests so disclosed will be recorded in the minutes of the meeting, including any actions taken to manage them.

If multiple members must recuse themselves and a quorum is lost, the matter will be raised with the Remuneration & Conflicts of Interest Advisory Board for their advice and recommendation.

6. Compliance and Monitoring

The College maintains a Declaration of Interests Register to record declared conflicts and the actions taken to manage them. This is updated annually at the start of Michaelmas Term. The Bursar will conduct an annual audit of all disclosed conflicts/gifts and any management actions taken. A report will be presented to the Governing Body, highlighting any trends, gaps, or areas of concern. The register itself will be available for inspection on request by members of Governing Body and by such other persons as Governing Body shall approve.

The Remuneration & Conflicts of Interest Advisory Board will review conflicts of interest, and will consider any particular conflicts of interest, or concerns about real or potential conflicts of interest, that are escalated to them.

Any member of the College who may be concerned about management of conflicts of interest should speak to the Warden or Bursar.

7. Exceptions

Individuals may not participate in decision-making processes that affect their individual interests. An exception exists when Governing Body considers the recommendations put forward by the Remuneration and Conflicts of Interest Advisory Board on remuneration and benefits for the Warden and Fellows. In this case, the conflict of interest has already been managed by: the restrictions on membership of the Remuneration and Conflicts of Interest Advisory Board; the Committee's procedure, as set out in its Terms of Reference; and the fact that Governing Body can only accept or reduce, but not increase the proposed remuneration terms.

8. Review

This policy will be reviewed every three years or more frequently if required by changes in legislation or College activities.

9. Related Documents

[Declaration of Interests forms](#) are available on SharePoint.

This policy should be read in conjunction with the College's [Donation Acceptance Policy and Procedure](#), [Anti-Bribery Policy](#) and [Purchase to Pay Procedure](#).

10. Contact Information

The Bursar is the policy owner and can be contacted on bursar@sant.ox.ac.uk for any help or clarifications required.
