Conflict of Interest Policy

Policy no:	1.8	**Version number**	V1
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Policy Owner	Head of Quality	**Next review due**	July 2026
External reference points	The Nolan Principles of Public Life Office for Students' Public Interest Governance Principles OFS Guidance for managing potential conflicts of interests (2019)		

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1. Introduction

This policy has been developed to ensure that all decisions and actions taken by members of Magna Carta College's governance, management, and operational bodies are made in the best interests of the College, free from any undue influence or personal gain. The purpose of the policy is to guide all staff and relevant individuals to deal with any conflicts that may arise. The policy document identifies what is meant by 'conflict of interest', clarifies how conflicts of interest may arise within the college and sets out how such conflicts should be managed.

2. Rationale and Scope

This policy applies to all members of the following MCC bodies:

- Board of Governance
- Audit & Risk Committee
- Remuneration Committee
- Senior Management Team
- Academic Board
- Admissions Board
- Operations Committee
- Talent Management Committee
- Assessment Board
- Programme Committees
- Registry Committee
- Student Support Committee
- Student Council Committee

It also applies to all staff, faculty, contractors, and volunteers engaged with MCC.

3. Definition of Conflict of Interest

A conflict of interest arises when an individual's personal, financial, or other interests could compromise or appear to compromise their judgement, decisions, or actions in their role at MCC.

Conflicts may be:

- Actual: a direct conflict exists.
- Perceived: a situation could be seen as a conflict.
- Potential: a conflict could arise in the future.

3.1. Examples of Conflicts

- Holding a financial interest in a company doing business with MCC.
- Participating in decisions involving a family member or close associate.

- Accepting gifts or favours that could influence decision-making.
- Using MCC resources for personal gain.

4. Responsibilities

All individuals at Magna Carta College (MCC), including members of governance bodies, staff, faculty, contractors, and volunteers, have an ongoing responsibility to act with integrity and transparency. It is the duty of every individual to be vigilant about and promptly disclose any actual, perceived, or potential conflicts of interest as soon as they become aware of them. This ensures that all decisions and actions taken within MCC remain unbiased and in the best interest of the institution.

The committee and board chairs at the college are responsible for ensuring that any conflict-of-interest declarations are made at the start of each formal meeting. They must ensure that any conflicts disclosed are recorded accurately and managed appropriately, which may include deciding on the recusal of individuals from certain discussions or decision-making processes. Where there is a notified potential conflict, the individual and member of the SMT must document this, completing the conflict-of-interest declaration.

The Audit & Risk Committee holds overarching responsibility for monitoring all declared and documented conflicts or potential conflicts across the college. They are tasked with reviewing declarations, ensuring the central register is up to date, and escalating any concerns that pose a higher risk to the Board of Governors. The Board of Governors retains ultimate accountability for ensuring that the policy is implemented and is reviewed regularly, maintaining institutional integrity.

4.1. All members shall:

- Disclose any actual, perceived, or potential conflicts of interest promptly.
- Refrain from participating in decisions where a conflict exists.

4.2. Chairs of Committees and Boards shall:

- Ensure declarations are made at the start of each meeting.
- Record and manage any conflicts disclosed.
- Decide on appropriate actions (e.g., recusal from discussion or vote).

4.3. The Board of Governance shall:

- Maintain oversight of conflict-of-interest disclosures across MCC.
- Review and update this policy annually.

5. Declaration Process

All individuals covered by this policy must complete an annual Conflict of Interest Declaration Form, as provided in Appendix 1. This form requires the disclosure of any relevant personal, financial, or professional interests that might influence or appear to influence their role at

MCC. In addition to this annual process, ad hoc declarations must be made as soon as a new conflict arises during the year.

Completed declarations must be submitted to the Registry Committee, which maintains the college's central Conflict of Interest Register. The Audit & Risk Committee will periodically review the register and assess the appropriateness of the mitigation measures applied. Any changes to an individual's circumstances should be reported without delay and updated within the declaration.

6. Management of Conflicts

Once a conflict of interest has been declared, appropriate management strategies must be applied depending on the nature and severity of the conflict. Full disclosure is the foundational step, ensuring transparency across all relevant stakeholders. Depending on the specific case, individuals may be required to withdraw from decision-making processes, relinquish certain responsibilities, or transfer duties to another member.
In more complex or high-risk scenarios, the college may decide to change the working arrangements to alleviate the risk or terminate the conflicting relationship altogether. The primary goal of this policy and its implementation is to safeguard institutional decision-making and ensure the fairness and integrity of all operations. Management strategies must be documented, monitored, and, where necessary, reviewed and updated.

Depending on the nature and severity of the conflict, management strategies may include:

- Full disclosure to relevant parties
- Recusal from discussions or decisions
- Reassignment of duties
- Termination of the conflicting relationship

7. Breach of Policy

In case of non-compliance with this policy, including failure to disclose a conflict of interest or failure to adhere to the mutually agreed management strategies, disciplinary action may be taken against the individual. Such breaches undermine the trust and integrity of MCC's operations and can adversely affect the institutional reputation.

The possible disciplinary actions may range from formal warnings and removal from committee or decision-making responsibilities to termination of employment or contractual arrangements in severe cases.

Each breach of the conflict-of-interest policy will be considered on a case-by-case basis, and appropriate actions will be taken under the college's disciplinary procedures. MCC recognises that ensuring transparency and accountability is a shared responsibility critical to maintaining public and institutional confidence.

8. Review and Oversight

The Audit & Risk Committee is responsible for monitoring compliance and reporting to the Board of Governance. This policy will be reviewed every year or as required by the Audit and Risk Committee.

Appendix 1

Declaration of Conflict of Interest
Name:
Position/Role at MCC:
Committee/Board Affiliation (if applicable):
Date of Declaration:

Nature of Conflict Please provide full details of any actual, perceived, or potential conflicts of interest. Examples may include personal, financial, professional, or family relationships, external activities, or affiliations that may influence your duties or decision-making at MCC
Proposed Mitigation Measures Please outline any actions that have been taken or proposed to manage the conflict of interest.

Declaration and Commitment I declare that the information provided in this form is accurate and complete to the best of my knowledge. I understand that it is my responsibility to update this declaration promptly if circumstances change. I am committed to acting with integrity and in accordance with MCC's Conflict of Interest Policy.
Signature:
Date:

Guidance:

- Please return the completed form to the line manager.
- The declaration will be reviewed by the Audit & Risk Committee and entered MCC's Conflict of Interest Register.
- All declarations will be treated confidentially and used solely for governance and assurance purposes