



Oriel College

UNIVERSITY OF OXFORD

CONFLICTS OF INTEREST POLICY

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A. Introduction

Oriel College is a registered charity, and as such is bound by the stipulations of the Charities Act, and is regulated by the Charity Commission.

Under Charity Commission regulation, all trustees have a legal obligation to act in the best interests of Oriel College, and in accordance with the College's governing documents, and to avoid situations where there may be actual or potential conflicts of interest.

College staff have similar obligations. This policy applies to those specified in **Section B: Scope**.

B. Scope

This policy applies to Trustees of the College and Senior Staff. If you are unsure whether this policy applies to you and you believe you may be required to declare a conflict of interest, contact the Financial Controller for clarification.

C. Information Security Classification

This policy represents part of the College's fulfilment of its obligations under the Charities Act and in line with the regulation of the Charities Commission, and as such will be posted on the College website.

Copies will also be available on the College's internal policy SharePoint, and from the Governance Officer (governance@oriel.ox.ac.uk).

Copies of the approved policy will be circulated to all trustees of the College annually in conjunction with trustees' declaration of any new conflicts of interest.

D. Delegated Authority

The Governance Officer, in conjunction with the Treasurer and Financial Controller, is responsible for the oversight of this policy, and that its stipulations are in line with current Charity Commission guidance and legislation.

The Governance Officer is responsible for updating this policy annually in Trinity Term and for bringing the updated policy to the Finance and Estates Committee for comment and recommendation to the College's Governing Body.

The Governance Officer is also responsible for circulating the updated policy – once approved – to all trustees of the College ahead of Michaelmas Term of each academic year, to remind trustees of their obligations and to allow them the opportunity to declare any new conflicts of interest.

E. Policy Statement

Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with, or have the potential to conflict with, those of the College. Such conflicts may create problems. They can:

- Inhibit free discussion

- Result in decisions or actions that are not in the interests of the College, and
- Risk the impression that the College has acted improperly.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety. This is in line with the College's Statutes which dictates that those who are placed under the Statutes shall operate without prejudice to any right or interest possessed by them.

F. Definition of Terms

"Conflict of Interest"

Any situation in which a Trustee or Senior Staff member's personal interests or loyalties could, or could be seen to, prevent them from making a decision only in the best interests of the College. This includes personal, financial and academic interests. It also includes conflicts of interests involving 'connected person(s)'.

"Connected Person"

Family, relatives or business partners of a Trustee or Senior Staff member, as well as businesses in which they have an interest through ownership or influence. The term includes spouses, unmarried or civil partners, children, siblings, grandchildren and grandparents as well as businesses where they or their family member holds at least one-fifth of the shareholding or voting rights.

The Charity Commission's "The Essential Trustee" contains a useful section explaining technical terminology concerning the governance of charities.

G. Procedure

Declaring Conflicts of Interest

In order that the College complies with its legal obligations, trustees and senior staff must declare on an annual basis their interests, and any gifts or hospitality received in connection with their role with the College.

Senior staff already report any gifts or hospitality received as part of the agreed **Financial Procedures Manual**.

The declaration of interests form will be circulated annually and must be completed by all trustees and senior staff ahead of the College audit, which takes place in September. Trustees and senior staff **MUST** complete the form, even if they have no interests to declare.

This register of interests shall also be used to record all gifts of a value over £20 received by the trustees and staff.

Interests and gifts will be recorded on the charity's probity book, which will be maintained by the Management Accountant. Items recorded in the probity book are reviewed annually by the Audit and Risk Committee.

If your conflict of interests relates to the undergraduate admissions process, you must declare this as part of your annual trustee declaration **AND** to the Tutor for Admissions and Outreach separately in line with the College's **Undergraduate Admissions Conflicts of interests policy and procedure**.

Conflicts of Interest will also be a standing item on relevant Committee agendas,

giving the opportunity to declare any relevant existing conflicts and to raise any new conflicts at the beginning of each Committee meeting.

What to do if you face a Conflict of Interest

As trustees or Senior Staff members, the conflict of interest must not be allowed to affect your decision. Where the conflict is a serious or complex conflict, trustees and Senior Staff members should consider whether it is in the College's best interests to remove the conflict. If you decide not to remove the conflict of interest, it must be managed to ensure that it does not affect your decision.

Should there be a discussion on an issue that you have a financial conflict of interest in, you should:

- Declare the conflict of interest,
- Withdraw from the relevant discussion,
- Not take part in the decision giving rise to the conflict,
- Not be counted in the quorum.

Where the conflict being managed is a loyalty conflict, there are various options depending on the severity of the conflict. Where the decision is high risk or controversial the same procedure as for financial conflicts should be followed. For low-risk loyalty conflicts, trustees or senior staff may remain in the meeting provided they do not take part in the decision or quorum.

Trustees (or senior staff) may, however, participate in discussions from which you may indirectly benefit, for example where the benefits are universal to all users, or where your benefit is minimal.

Decisions taken where a Trustee of Member of Staff has an Interest

All decisions under a conflict of interest will be recorded by the Governing Body Secretary and reported in the minutes of the meeting. The report will record:

- The nature and extent of the conflict.
- An outline of the discussion.
- The actions taken to manage the conflict.

Where a trustee benefits from the decision, this will be reported in the annual report and accounts in accordance with the current Charities SORP.

Payments or benefits in kind to trustees will be reported in the charity's accounts and annual report.

Where a member of the College's staff is connected to a party involved in the supply of a service or product to the charity, this information will also be fully disclosed in the annual report and accounts.

Managing Contracts

If senior staff (or trustees) have a conflict of interest, they must not be involved in managing or monitoring the contract in which they have an interest. Monitoring arrangements for such contracts will include provisions for an independent scrutiny of invoices, and termination of the contract if the relationship is unsatisfactory.

H. Training and Responsibilities

New trustees of the College are recommended to be familiar with the stipulations outlined in the **Essential Trustee** published by the Charity Commission, which contains details of obligations of Fellows as a trustee of the College.

The University offers training for Governing Body Fellows who are trustees at the beginning of each academic year, and all Fellows who wish to take part may enroll on this training. Those Fellows who are newly appointed or who have last received training more than 5 years ago are strongly encouraged to enroll.

All trustees and senior staff must be familiar with this policy and must ensure that they complete the conflicts of interest form (attached at **Appendix A** for convenience) before September of each academic year.

I. Internal Help and Raising Concerns

Those who are concerned that a trustee or senior staff member is acting in contravention of their legal obligations should contact the Treasurer in confidence. All concerns will be dealt with in line with the College's **Whistleblowing Policy**.

J. Consequences of Non-Observance

Declaring relevant conflicts of interest is a legal requirement for trustees and senior staff members, and therefore non-compliance with this policy will be dealt with using appropriate severity.

K. Further Help

If you are not sure what to declare, please err on the side of caution. If you would like to discuss this issue, please contact the Treasurer or Financial Controller for confidential guidance.

For questions about this policy, please contact the Treasurer or the Financial Controller.

L. Reference

The policy maintains a separate policy on conflict of interests arising in Undergraduate Admissions: **Undergraduate Admissions Conflicts of interests policy and procedure**

This policy should be read in conjunction with the following policies and documents:

- **Whistleblowing Policy**
- **Financial Procedures Manual**
- **The Oriel College Statutes (the College's Governing Document)**
- **The Oriel College By-Laws**
- **The Essential Trustee** ([The essential trustee: what you need to know, what you need to do - GOV.UK \(www.gov.uk\)](#))
- [CC29: Identifying and Managing Conflicts of Interest in a Charity](#)

M. Policy Version Control Table

Version	Owner	Agreed by Finance and Estates Committee	Agreed by Governing Body	Reason for amendment	Amended by	Next review	Further notes
v.1	Governance Officer	07 June 2023	14 June 2023	This is the original version.	Governance Officer		
v.2	Governance Officer	11 June 2025	18 June 2025	Annual review	Governance Officer	Trinity Term 2026	
v.3	Governance Officer	13 May 2026	20 May 2026	Annual review	Governance Officer	Trinity Term 2027	

N. Appendices

[Appendix A – Conflict of Interests Declaration Form](#)**CONFLICTS OF INTEREST DECLARATION FORM**Name: Click or tap here to enter text.Position / role: Click or tap here to enter text.**Please Tick As Appropriate:**

- I have read and understood the Conflict of Interests Policy
- I have no existing/potential conflicts of interests to declare
- I would like to declare the following existing/potential conflict(s) of interests persons/companies or organisations with whom/which I have official dealings and/or private interests, including any conflicts involving an 'interested party':

 Click or tap here to enter text.

I confirm that I have not received any gifts or hospitality that have not been declared via the College probity book.

I would like to declare receiving the following gifts and/or hospitality for the College probity book.

 Click or tap here to enter text.

Sign name:	<input type="text"/>
Print name:	<input type="text"/>
Date:	<input type="text"/>