



**POLICY ON
CONFLICT OF INTERESTS AND
THE REGISTER OF INTERESTS**

1. INTRODUCTION

Conflicts of interest could arise in many circumstances and it is not possible to provide a single definition to cover them all. A conflict of interest may be defined as including:

'a conflict between the official responsibilities of a person in a position of trust and any other interests the particular individual may have, e.g. where the individual could be seen to be influencing college matters for actual or potential personal benefit, or seeking such a gain at the expense of the College'.

In summary, the Conflicts of Interest Policy provides for a three-fold approach:

- Disclose always
- Manage the conflict in most cases
- Prohibit the activity when necessary to protect the public interest or the interest of the College.

2. PURPOSE OF A REGISTER OF INTERESTS

The aim is to identify those activities and interests which governors and senior leadership team members (Officers in attendance) consider they should volunteer into the public domain because those interests might be interpreted as carrying a risk of bias in the conduct of that person's duties.

3. MAIN CHARACTERISTICS OF THE REGISTER

The Register is compiled from information given by each individual. They are asked to declare any commercial, personal, family or voluntary interest which may be linked to the College and its operation. Please see Appendices 1 and 2 for governors and Senior Leadership members.

4. DO I NEED TO REGISTER?

All members of the Corporation and the Senior Leadership Team of the College must register their interests, review these annually and update their entry as necessary.

5. HOW TO DECIDE IF AN INTEREST IS RELEVANT

An interest need only be declared if the individual considers it relevant to their duties as a member of the Corporation or the management of the College or where there is a risk of it being reasonably perceived as biasing their decisions while conducting those duties. As far as possible there should be a distinction between the criteria for declaring an interest and the fact that declaring an interest is a personal decision. The following notes are therefore designed to assist those making entries on the Register to decide as impartially as possible whether to record an interest:

- would an external observer, knowing the facts of the situation, reasonably think that the person might be influenced by the interest;
- the form for registration will have headed columns for the type of interest to be registered, thus providing a framework for deciding what to register;

- the presumption is always in favour of declaring an interest: if a person is in doubt whether to register an interest, that means they should register it;
- those who are still in doubt can approach the Corporation Secretary for guidance about whether to declare a particular interest or not;
- any failure to declare an interest will be investigated by the Governance & Search Committee

6. TYPES OF INTEREST TO BE REGISTERED

The exact nature of the interest will vary according to personal circumstances, but the following are examples of interests which should be declared if relevant to College duties:

- Corporate: any relationship with a named company with which the College might do business, including the College's own subsidiaries. Such interests would include:
 - ownership or part ownership;
 - share-holdings or other beneficial interest such as options, warrants etc. (where known). Only share-holdings above the 3% notifiable level need be declared;
 - directorships;
 - paid employment, specifying position held (a lower limit of £1000pa);
 - partnership, consultancy, or close family connection.
- self-employment: names of any client accounting for more than 5% of your total annual earned income;
- property: freehold or leasehold ownership of any properties in which the College might have an interest;
- charities: trusteeship or governorship of or employment with, any charities or voluntary organisations;
- public appointments: paid or unpaid;
- memberships: membership of professional bodies, trade or other association, or external bodies;
- close family links: specified close family interest in any of the above. The definition of "close" would be up to the registrant to decide. It is appreciated that a declaration may be difficult to declare if information is not forthcoming from a family member.

In all of the above, registrants are not expected to quantify the extent of a financial interest, merely the fact that one exists.

7. FORM OF REGISTRATION

Interests should be recorded on the appropriate form, available from the Corporation Secretary. These will be collated for publication within one single Register.

8. INSPECTION OF THE REGISTER

The Register is held centrally by the Clerk and will be made available for inspection by the public upon request during office hours (8.30am-5.00pm). For further information please call 01491 634312 to make an appointment.

The Corporation will not use information provided on the form for any purpose other than the Register.

9. UPDATING OF REGISTER ENTRIES

The Register is updated annually. The information to use is that which is current at the time of filling in the pro forma. Those who register are expected to update their entry whenever any relevant change of personal circumstances occurs.

10. DECLARATIONS AT MEETINGS

The Corporation also requires governors to declare a conflict of interest, if necessary, at a meeting. The nature of the conflict and the agenda item it relates to will be noted in the minutes.

11. UNDECLARED CONFLICT OF INTEREST

Any failure to declare a relevant interest may be investigated by the Governance & Search Committee.

Clerk
October 2019

REGISTER OF INTERESTS 20 /20 FOR GOVERNORS

The following questionnaire is issued to Corporation members to obtain information for the maintenance of required registers and for general administration purposes. All information received will be treated as confidential. Please telephone 01491 634312 if you have any queries and return the document to: Jacky Gearey at The Henley College, Deanfield Avenue, Henley-on-Thames, Oxon, RG9 1UH.

PERSONAL DETAILS

Name:.....

Home address:

Home tel no:

E-mail address.....

Mobile tel no:.....

Business address (if applicable):

Business tel no:

REGISTER OF MEMBERS' INTERESTS

The following is a summary of the typical interests to disclose.

Category of interest	Information to be disclosed
Paid employment	Name of employer
Self employment	Names of significant customers/clients accounting for more than, say, 10% of income of individual firm
Directorships of commercial companies	Names of companies
Significant shareholdings	Names of companies in which the corporation member owns, say, 5% or more of the issued share capital
Elected office	Name of authority
Trusteeships of participation in the management of charities and other voluntary bodies	Name of body
Public appointments (paid or unpaid)	Name of body
Membership of professional bodies	Name of body

Each member is required to register all business interests, financial or otherwise, which they or (so far as they are aware) their spouses or partners, children or other close relatives may have. Members should inform the Corporation Secretary whenever their circumstances change and interests are acquired or lost.

Name	Nature of Interest	Date on which Interest was disclosed	Date on which Interest was lost or changed

Other activities:

Committees:

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(Please indicate any statutory bodies or voluntary organisations of which you are either a member, or with which you have regular contact.)

ELIGIBILITY

The statements below confirm **eligibility** to be a member of the Corporation, as defined in the Instrument of Government clauses 8 and 11.

Statement	Yes	No
I confirm that I am aged over 17 {see Instrument 8(1)} *		_____
I confirm that I have not been adjudged bankrupt or made a composition or arrangement with my creditors ** {see Instrument 8(5), 8(6), and 8(7)}	_____	
I confirm that I have not had a sentence of imprisonment for a period of greater than 3 months, without the option of a fine, within 5 years before my appointment or during my appointment as a Governor {see Instrument 8(8)(a)}		
I confirm that I have not had a sentence of imprisonment for a period of greater than 2.5 years, whether suspended or not, within the 20 years before my appointment or during my appointment as a Governor {see Instrument 8(8)(b)}		
I confirm that I have not had a sentence of imprisonment, whether suspended or not, greater than 5 years at any time {see Instrument 8 (8)(c)}		
I confirm I have no undeclared financial interest in the College or in the supply of work or goods or contracts concerning the College {see Instrument 11(1), 11(2) and 11(3)}		

* Student Governor only – date of birth.....(if under 18 years of age)

** In certain circumstances disqualification for these reasons may cease – reference should be made to Instrument paragraphs 8(6) and 8(7) if necessary and the question answered appropriately.

Name (please print)

SignedDate

Appendix 2

THE HENLEY COLLEGE CORPORATION

REGISTER OF INTERESTS FOR OFFICERS IN ATTENDANCE 20 /20

The following questionnaire is issued to members of management and staff at the College to obtain information to maintain required registers and for general administration purposes. All information received will be treated confidentially. Please telephone 01491 634312 if you have any queries and return the document to Jacky Gearey at The Henley College, Deanfield Avenue, Henley-on-Thames, Oxon, RG9 1UH.

**The following is a summary of the typical interests to disclose.
See attached Guidelines for further information on how to complete this section.**

Category of interest	Information to be disclosed
Paid employment	Name of employer
Self employment	Names of significant customers/clients accounting for more than, say, 10% of income of individual firm
Directorships of commercial companies	Names of companies
Significant shareholdings	Names of companies in which the corporation member owns, say, 5% or more of the issued share capital
Elected office	Name of authority
Trusteeships of participation in the management of charities and other voluntary bodies	Name of body
Public appointments (paid or unpaid)	Name of body
Membership of professional bodies	Name of body

Each member of staff is required to register all business interests, financial or otherwise, which they or (so far as they are aware) their spouses or partners, children or other close relatives may have. Members should inform the Corporation Secretary whenever their circumstances change and interests are acquired or lost.

Name	Nature of Interest	Date on which Interest was disclosed	Date on which Interest was lost or changed

Other activities/committees outside College

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(Please indicate any statutory bodies or voluntary organisations of which you are either a member, or with which you have regular contact.)

Name (please print)

Signed Date