



TRINITY
HALL
CAMBRIDGE

Conflicts of Interest Policy

Contents

A	Policy Statement.....	2
B	Identification of Disclosable Interests	2
C	Declaration of Disclosable Interests	3
D	Procedure in Case of Declaration of Disclosable Interests	3
E	Register of Interests	3
F	Summary of Responsibilities.....	4
	Version Control Table	4
	Appendix: Register of Interests of Master & Fellows/Committee Members	5

A Policy Statement

The College is committed to ensuring that high levels of integrity apply in all areas of its operations and that all governance activities are conducted in an honest and transparent manner. The aims of this Policy are to:

- Enable Fellows, operational staff ("staff"), students and external committee members to recognise where their personal interests conflict with, or may reasonably be perceived to conflict with their College governance duties;
- Communicate the expectations for declaring and recording such conflicts of interest; and
- Set out the processes for managing conflicts of interest in order to ensure that College decisions are made objectively and in the best interest of the College.

The governance of the College, through its committees, must be conducted in accordance with this Policy. Therefore, in addition to applying to all Fellows and staff, the Policy also applies to students and external committee members.

B Identification of Disclosable Interests

1. A conflict of interest exists when a reasonable person would consider that the duties owed by an individual to the College conflict with, or may possibly conflict with a personal, financial or other interest or duty that the individual holds and/or with the interest of someone who has a close personal connection to the individual (including, but not limited to, any children, in-laws, siblings, partner or spouse) as far as they are reasonably known.
2. An interest does not require disclosure under Rule 1 unless the individual concerned was aware of the existence of the interest or should reasonably have been aware of it at the point where it should have been declared.
3. An interest need not be disclosed under Rule 1 if:
 - a) it is an interest which arises as a result of being a company director of a company which is a wholly owned subsidiary of the College;
 - b) it is an interest which arises as a result of being a charity trustee, unless the relevant charity may be engaged in any business, appeal, or transaction involving the College;
 - c) it is an interest which arises from a generalised review of College stipends (provided, in the case of the College Officers, that this exemption from disclosure only applies in relation to an increase in their respective stipends which reflects a general percentage stipend increase);
 - d) it is an interest which arises in connection with appointment or re-appointment to any unpaid position within College; or
 - e) it is an interest which arises as a result of holding shares in a company where the individual's shareholding represents less than 5% of the total issued share capital of the company;
 - f) it is an interest which arises from membership of a Faculty or Department in the University of Cambridge (the "University"), or the holding of an office or position in the University, where the other members of the Faculty or Department or the other persons holding such an office or position in the University, as the case may be, have a similar interest.

C Declaration of Disclosable Interests

4. Any individual who has a disclosable interest (as defined in Section B) in any matter of business before any meeting of:
 - a) Governing Body; or
 - b) any College Committee (including sub-committees, advisory groups and working groups)

shall declare that fact on each occasion that that business is under consideration. Where such a declaration is made the procedure contained in Rules 7 to 8 shall be followed.

5. Rule 4 shall not apply to business which is solely for report and which is not for discussion at the relevant meeting.
6. If any individual considers that any other individual may have an interest which should be disclosed under Rule 4, then the first-mentioned individual may ask the relevant meeting to determine the matter. In such a case, the issue shall be considered in the absence of the second-mentioned individual, after hearing their views, and the meeting's decision shall be binding on the second-mentioned individual.

D Procedure in Case of Declaration of Disclosable Interests

7. Where an interest is declared in accordance with Rule 4, then the individual declaring it:
 - a) shall not speak on the matter; and
 - b) shall withdraw from any meeting while the business is under consideration

unless the meeting shall have resolved to the contrary.
8. Irrespective of whether a resolution has been made in accordance with Rule 7, the individual declaring the interest may not vote on a matter of business in which they have a material pecuniary interest.

"Pecuniary interest" refers to an interest that an individual has in a matter where there is a reasonable likelihood or expectation of financial gain or loss.

9. Any withdrawal or resolution made in accordance with Rule 7 shall be recorded in the Minutes of the meeting.

E Register of Interests

10. Each Fellow or staff member shall notify the Bursar of any new disclosable interest which may require a declaration to be made under Rule 4.
11. The Bursar shall maintain a Register of all disclosable interests which are notified to them.

12. The Register mentioned in Rule 11 should also record any material shareholding (5% or more) and/or directorship of any company or charity, or trusteeship in a charity, if there is a reasonable possibility that the company or charity may be engaged in any business, appeal or transaction involving the College which is notified to the Bursar.
13. The Register mentioned in Rule 11 shall be available for inspection in the Bursary by any member of the Governing Body whilst having due regard for the rights due to third parties in respect of their personal data.

F Summary of Responsibilities

14. All Fellows and staff members must disclose conflicts of interest with their College governance duties to the Bursar at the earliest opportunity.
15. All committee, advisory group or working group chairs are responsible for:
 - asking for declarations of interest in relation to the agenda at the start of each meeting;
 - determining how to manage each conflict in the context of their meeting; and
 - ensuring that the declarations and any mitigating actions are minuted within the framework of this Policy.
16. The Bursar is responsible for ensuring that an up-to-date College Register of Interests is maintained.
17. Members of the Governing Body, as Charity Trustees, have a legal duty to avoid conflicts of interest and to act in the best interests of the Charity. Individuals who are elected to the Governing Body must declare potential conflicts of interest upon election. Potential conflicts of interests should be declared during the appointment process for Fellows in Classes A, B and C.
18. The Bursar is responsible for ensuring that this Policy is maintained, that appropriate explanatory guidance is provided and for monitoring compliance with this Policy.
19. The Audit Committee will receive a report on compliance with this Policy annually.

Version Control Table

Version	Date	Major Change	Approved	Owner
1.0	Jan 2007	New Policy	GB 23.01.2007	Bursar
2.0	Feb 2025 Jun 2025	Draft update Revised draft	GB 24.06.2025	Bursar
3.0	Sep 2025	Revised draft	GB 04.11.2025	Bursar

Appendix: Register of Interests of Master & Fellows/Committee Members

In accordance with the College's Policy on Conflicts of Interest, committee members are required to register their interests and/or the interest of someone who has a close personal connection to them (including, but not limited to any children, in-laws, siblings, partner or spouse) as far as they are reasonably known, with the Bursar who shall record that information in a register. A copy of the [Policy on Conflicts of Interest](#) is available from the [College Governance](#) section of the website and includes information on the identification of disclosable interests.

Please set out in the table below interests which you consider relevant. These may include but are not limited to:

- The holding of any office or position in the College (other than committee memberships)
- Any material shareholding (5% or more) and/or directorship in a company or charity, or trusteeship in a charity, if there is a reasonable possibility that the company or charity may be engaged in any business, appeal or transaction involving the College.

As and when they come up in committee / Governing Body business, the Master & Fellows/committee members should declare interests which are relevant, but not sufficiently material to merit inclusion in the register.

Committee members should notify the Bursar if any new material interest occurs during the course of their membership of a committee.

Interest to be declared	Summary of interests
Any relevant material shareholding (5% or more) and/or directorship in a company or charity, or trusteeship in a charity	
Any office or position held in the College (other than committee memberships)	
Any other disclosable interests	

Name	Signature	Date