Author:	Registrar Pinsent Mason s	

Owner:

*UCFB and GIS are trading names of Undd

1. Introduction , Purpose and Scope

- As a registered provider of higher education, University Campus of Football Business Limited (" UCFB") must comply with the Office for Students' ("OfS") ongoing conditions of registration, including those that specifically relate to governance. One of the p rimary responsibilities of a governing body is to ensure the establishment and monitoring of systems of control and accountability, including procedures for managing conflicts of interest.
- 1.2 This Policy applies to the members of the Board of Directors of UCFB and its constituent committees (i.e. the Academic Board) , including staff members, student members and co -opted members (together, the "Directors and Committee Members"). It sets out the principles, guidelines and procedures for identifying, monitoring and managing actual and potential conflicts of interest.
- 1.3 The members of the Board of Directors must also each pay regard to the conflict of interest provisions set out in UCFB's Articles of Association in relation to their position as a company director.

2. Policy

- 2.1 There is a general duty on all Directors and Committee Members to disclose at the earliest possible stage any situation in which a Directors and Committee Members' direct or indirect interests could, or could be seen to, prevent them from making a decision only in the best interests of UCFB, and to act in accordance with this Policy when such a n interest arises.
- 2.2 The disclosure of an interest should be made in writ ing by a Director and Committee Member to the Registrar:
 - 2.2.1 as part of a general declaration on appointment as a Director and Committee Member :
 - 2.2.2 on an annual basis when requested to do so by the Registrar;
 - 2.2.3 as soon as possible if there is a material change in their interests , external or otherwise ; and
 - 2.2.4 at the start of meetings or meeting items where their conflict is relevant.
- 2.3 The Registrar will publish and maintain a register of declared interests of the Directors and Committee Members which shall b e made available for inspection by the public upon reasonable request to the following address: [insert UCFB email address].

3. Identifying a C onflict of Interest

- 3.1 Conflicts of interest may arise:
 - 3.1.1 where a Director and Committee Member (or a person connected to them such as a spouse, partner or close relative) stands to obtain a benefit from UCFB; or

4.5 The Registrar must note all conflicts declared in the minutes of the meeting in which they were declared or, if not declared in a meeting, in the minutes of the next m eeting. The Registrar shall then update the register of Director and Committee Members interests accordingly.

5. Dealing with a Conflict of Interest

- 5.1 The first item on the agenda of each meeting of the Board of Directors and its committees will be a standing item with respect to the reporting of interests , with the following procedure applying :
 - 5.1.1 Directors and Committee Members attending the meeting are to declare any conflicts of interest relating to the matters to be discussed at the meeting;
 - 5.1.2 the Chair will inform the other Directors and Committee Members and the Registrar of any conflict of interest that has been declared by a Director and Committee Member prior to the meeting that relates to the business to be discussed at the meeting; and
 - 5.1.3 in advance of the next meet ing of the Board of Directors, the Registrar will circula te any amendments or additions to t he register of Directors and Committee Members interests made since the last meeting.

APPENDIX