# CONFLICTS OF INTEREST POLICY

**Ignition Pro - School for Entrepreneurs Limited**

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| **Document Title:** | Conflicts of Interest Policy |
| **Policy Owner:** | Chief Executive Officer / Registrar |
| **Approved By:** | Board of Governors |
| **Approval Date:** | April 2026 |
| **Review Date:** | April 2027 |
| **Version:** | 1.1 |

## 1. PURPOSE

This policy applies to all members of the Board of Governors, all members of institutional committees, all employees, and all external consultants and contractors engaged by Ignition Pro – School for Entrepreneurs Limited ("the Institution"). It explains what a conflict of interest is, how conflicts must be declared, and how they are assessed, recorded, and managed.

Following this policy is a condition of appointment to the Board or any committee, and of employment or engagement with the Institution. All individuals are responsible for identifying and declaring any actual, potential, or perceived conflicts of interest as soon as they arise, and for cooperating with the processes used to manage them.

This policy reflects the Institution's legal and regulatory obligations, including those under the Companies Act 2006, recognised governance standards for independent higher education providers, the Nolan Principles of Public Life, and the requirements of the Office for Students. It also supports the Institution's wider arrangements for governance, risk management, and internal control.

The Institution is committed to high standards of integrity, transparency, and accountability. Decisions must be made in the best interests of the Institution and its students, without influence from personal, financial, or other external interests. Even the perception of a conflict can damage confidence in decision-making and the Institution's reputation.

For this reason, conflicts must be identified early and managed in a clear and consistent way. This may include declaring the interest, limiting involvement in discussions, or withdrawing from decision-making where appropriate. All conflicts and the actions taken are recorded to ensure transparency and accountability.

By setting out clear expectations and processes, this policy helps ensure that decisions are fair, well-informed, and in the public interest, while protecting both the Institution and the individuals involved.

## 2. WHAT IS A CONFLICT OF INTEREST

A conflict of interest exists when an individual's personal interests, or their loyalties to another person or organisation, conflict - or could reasonably be perceived to conflict - with their duty to act in the best interests of Ignition Pro - School for Entrepreneurs Limited. Conflicts may be direct, where the individual stands to benefit personally, or indirect, where someone closely connected to them - a spouse, civil partner, or immediate family member - stands to benefit.

Common examples include holding a financial interest in an organisation that does or may do business with the institution, having a personal relationship with someone being considered for appointment or a contract, holding a governance role at an organisation whose interests may cut across those of the institution, and receiving gifts or hospitality from external parties in circumstances that could reasonably influence decisions. The test is not whether a conflict definitely exists but whether a reasonable person, knowing the facts, might perceive one. Once that threshold is reached, the obligation to declare is triggered.

## 3. DECLARING AN INTEREST

All governors and committee members complete a Declaration of Interests Form on appointment and update it annually, or whenever a change in circumstances gives rise to a new interest. The Register of Interests is compiled from these declarations, maintained by the Registrar, and available for inspection by any Board member on request.

Beyond the annual declaration, any conflict arising in the course of a specific meeting or decision must be declared at the start of the relevant agenda item, or as soon as the individual becomes aware of it. The Chair then decides on the appropriate course of action. In most cases this will mean the individual taking no part in the discussion. Where the conflict is minor and the Chair is satisfied it poses no real risk to the integrity of the decision, the individual may remain with the conflict noted in the minutes. In more serious cases the individual will be asked to leave the meeting for the relevant item.

Employees and consultants who become aware of a conflict between personal interests and their responsibilities to the institution must disclose it to their line manager or the Registrar promptly, and must not act in a way that benefits personal interests at the institution's expense before the matter has been assessed and guidance given.

## 4. MANAGING CONFLICTS

The steps taken to manage a declared conflict are proportionate to its nature and potential impact. Options include the individual recusing themselves from relevant discussions and decisions, restricting access to relevant confidential information, revising contractual arrangements, or in serious cases standing down from their position. Every declared conflict and the action taken in response is recorded in the minutes of the relevant meeting and, where the individual is a Board member, in the Register of Interests. The Register is reviewed by the Board at least annually.

## 5. GIFTS AND HOSPITALITY

No governor, committee member, employee, or consultant may accept any gift, hospitality, or other benefit from an external party that could reasonably influence decisions or actions relating to the institution. Any offer must be declared to the Registrar. The institution's Anti-Bribery Policy contains detailed provisions on this and should be read alongside this policy.

## 6. RESPONSIBILITY AND CONSEQUENCES

The Registrar maintains the Register of Interests, ensures declaration forms are completed and kept current, advises on the management of specific conflicts, and reports to the Board annually on how this policy is operating. New governors and committee members sign their Declaration of Interests before attending their first meeting. New employees comply with this policy from their first day in post.

Failing to declare a conflict, or failing to manage a declared conflict appropriately, is treated as a serious matter. For employees it may lead to disciplinary action; for governors and committee members it may lead to removal from office. The Board reserves the right to review any decision taken in circumstances where an undisclosed conflict of interest subsequently comes to light.

## 7. REVIEW

This policy is reviewed annually by the Board of Governors. Material amendments require Board approval. It is published on the institutional website and made available to all staff on joining.

### Appendix 1: Declaration of Interests Form

Complete this form on appointment and review it annually. Notify the Registrar of any changes as they arise. The declaration covers your own direct interests and any interests held by a spouse, civil partner, cohabitee, or immediate family member that could give rise to a conflict.

| Category | Direct interests of member | Indirect interests (spouse / partner / immediate family) |
|---|---|---|
| Employment - any remunerated roles or consultancy work, including the name of the organisation and your role | | |

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| Directorships - including the name of the organisation and its company registration number | | |
| Shareholdings - in any public or private company or other body | | |
| Trusteeships - details of charities and voluntary bodies, including charity numbers | | |
| Public appointments - including board and committee roles | | |
| Political interests - those that are a matter of public record | | |
| Professional bodies - membership of professional bodies and trade or other associations | | |
| Other interests - any interests not captured above | | |

I confirm that to the best of my knowledge and belief I have declared all interests in line with the Conflicts of Interest Policy of Ignition Pro - School for Entrepreneurs Limited.

Name (print): ________________________________________

Signed: ________________________________________

Date: ________________________________________

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