



Registered in England and Wales at
13 North Common Road, Ealing,
London, W5 2QB, Phone: 02088323071

Registered no: 2918520

Registered Charity no: 1050175

Conflict of Interest
Metanoia Institute

Version Control

Document title: Conflict of Interest Policy		No of pages:
Version Number: 2	Date first published: 2021	
Approved by: Board of Trustees	Last review date: May 2025	
Date originally approved: 2021	Due for next review: May 2028	

Related policies
• Dual Relationships • Anti-Bribery and Anti-Corruption Policy • Trustees Code of Conduct • Staff Grievance Policy and Procedure • Staff Disciplinary Policy and Procedure • Financial regulations
External Reference
• OfS Regulatory Framework guidance on Registers of Interest • Charity Commission Conflicts of Loyalty and Conflicts of Interest Guidance

1. Contents

1. Policy Statement and Purpose.....	3
2. Scope.....	3
3. Defining Conflicts of Interest.....	3
4. Declaring and Recording Conflicts	4
5. Managing Conflicts of Interest.....	5
6. Monitoring and Review	7

1. Policy Statement and Purpose

1.1 The Metanoia Institute encourages externality in its processes for the purpose of sharing good practice and continuous improvement. In this context, and as a small, specialist provider of higher education with strong connections and partnerships within the sectors of health services and education, the potential for conflicts of interest may easily arise. This Conflict of Interests Policy supports the wider policy landscape at Metanoia – including its Code of Ethics for students and practitioners, codes of conduct for Trustees, the conduct and contractual policies and procedures for staff - to ensure and demonstrate the Institute's commitment to integrity, and to encourage the declaration of conflicts of relevant interests as they arise so that they may be appropriately managed. A conflict of interest being present is not, in itself, an indication of any wrongdoing by a member of the Metanoia community provided it is well managed. The intention of this policy is to provide a supportive and transparent approach to allow the Institute to best manage and address any conflicts of interest as the institute engages in its business.

2. Scope

2.1 This Policy applies to all Metanoia Institute staff, to all members of the Board of Trustees, and to student and external members of Institute committees or equivalent bodies, such as working groups. For the purposes of this Policy 'staff' refers to all individuals working within the Institute at all levels and grades (whether paid or unpaid), including employees (whether permanent, fixed-term or temporary), any other visiting research or teaching staff, workers, trainees, seconded staff, agency staff, agents, volunteers, interns or any other person working in any context within the Institute.

3. Defining Conflicts of Interest

3.1 A conflict of interest exists when the duties owed by an individual to the Institute conflict with (or could be seen to conflict with) a personal, financial or other interest or duty that the individual holds and/or by the interests of someone who has a close personal connection to the individual.

3.2 The existence of a conflict of interest does not therefore depend on whether the individual is actually influenced in their duties or decisions. It arises whenever an interest could reasonably be perceived as affecting, or having the capacity to affect, an individual's ability to make impartial decisions in the best interests of Metanoia.

3.3 A potential conflict exists where the interests of an individual are not in conflict **at present**, but there is a **reasonable likelihood** that they may give rise to a conflict in the future (see examples in appendix).

3.4 Conflicts of interest do not only arise at Board level, or in senior leadership roles, but can impact relationships across the Metanoia community. They affect (or have the potential to affect) anyone.

3.5 Conflicts of interest can arise both from roles or activities involving parties outside the Institute or where staff and other committee members hold multiple roles inside the Institute.

3.6 Conflicts may arise from activities such as procurement, commercial transactions, conduct and funding of research, contractor selection, admissions and recruitment, Complaint or other Panel chairing and decision making and other areas (this is not an exhaustive list).

3.7 Conflicts of interest can be financial or non-financial:

- **Financial conflicts** can arise where there is (or appears to be) an opportunity for **personal** financial gain; financial gain to someone with a **close personal connection** to the individual; or where it might be reasonable for another party to take the view that financial benefits might affect that person's actions. (Examples include payments, benefits in kind, equity interests, gifts, hospitality or intellectual property rights. The Metanoia approach to Gifts and Hospitality is outlined in our Anti-Bribery Policy.)
- **Non-financial interests** may include any direct or indirect benefit or advantage, enhancement of an individual's career or education or gain to a connected person. Staff and other committee members should therefore consider who they are acting for, and whether there are any competing motivations or interests that could influence them, or be seen to influence them (examples include external activities and public comment; simultaneously being an employee and a student where one role may conflict with another).

3.8 See Appendix 1 for an illustrative list of examples of potential conflicts of interest.

4. Declaring and Recording Conflicts

Roles and Responsibilities

4.1 All employees must act in the best interest of Metanoia Institute and in line with relevant codes of conduct and policies and procedures.

4.2 Individuals must disclose all conflicts of interest in writing at the time the conflict first arises or becomes known, including when it is recognised that a conflict might reasonably be perceived. Employees shall make their Line Manager and the People and Culture Team aware of a potential conflict of interest as soon as it arises.

- 4.3 All staff must complete a 'Declaration of Interest' form truthfully and in a timely manner when requested to do so through their onboarding and or induction processes.
- 4.4 For the Executive and Board of Trustees, the Head of Governance and Compliance is responsible for ensuring a local Register of Interests is maintained and kept up to date, and published as relevant and required.
- 4.5 The People and Culture team will ensure a local register of interests is maintained for all other staff.
- 4.6 Other than in relation to members of the Board of Trustees, whose declarations are published, conflicts of interest declarations will be treated confidentially insofar as the law permits.
- 4.7 Where there is any doubt about any transaction or relationship giving rise to a conflict of interest, the Chief Executive (or suitably senior nominee), shall be responsible for determining whether such a transaction or relationship constitutes a conflict of interest in line with this policy. A basic risk assessment will be completed and the reasons for the decision and any mitigations recorded.
- 4.8 Members of the Institute's Board of Trustees, as trustees of a registered Charity and of a limited company registered by the OfS in the fee cap category, have a legal duty to avoid conflicts of interest and to act in the best interests of the Charity. In accordance with Condition E2 (Management and Governance) of the OfS' [Securing student success: Regulatory framework for higher education in England](#), a register of their declarations will be made publicly available on the Institute website.

Declarations at Committees

- 4.9 'Declarations of interest' should be a standing item at the beginning of every Committee meeting, so that members and *regular attendees* can declare any conflicts of interest in relation to that specific agenda. For the purposes of this Policy, 'regular attendees' are those individuals who have a standing invitation to attend the meetings and who receive a full set of the unreserved papers (e.g. secretary and 'in attendance' members who might influence the conversation.)
- 4.10 The Chair, with advice from the Servicing Officer, will decide on the course of action for managing each conflict.
- 4.11 Both declarations and mitigating actions should be minuted.

5. Managing Conflicts of Interest

- 5.1 Line Managers, in consultation with HR (and the HoGC if escalated to them) should decide on the course of action for each conflict that is declared to them, confirm this to the declarer

in writing and ensure a record is sent to governance@metanoia.ac.uk so that it can be recorded in the Institute's Register of Conflicts of Interests.

5.2 The HoGC may share the information with the Chair of any relevant committee, if the interest is relevant to the individual's membership of that committee (or if the individual is a regular attendee of that committee).

5.3 On rare occasions (e.g. in the case of particularly complex or disputed conflicts) the HoGC may need to seek guidance from the CEO, the Chair of the Ethics Committee or external legal counsel.

5.4 The CEO (or suitably senior nominee) will decide whether any action is necessary to manage each interest which their members or regular attendees disclose via the annual declaration of interest form.

5.5 In some situations, simply disclosing and recording the interest in this way may be the only necessary action.

5.6 In other cases, in order to ensure that decisions are made in a fair and transparent way, more active management may be required. This will depend on the nature and context of the interest, but could include:

- not taking part in discussion or decisions/votes relating to certain matters at committee;
- not taking part in decisions relating to certain matters, but still being present for any discussion;
- referring decision-making on certain matters to others;
- agreeing not to act in a particular role (e.g. as a particular person's supervisor or case handler).
- divesting or placing in trust certain financial interests;
- publishing a notice of interest;
- standing aside from any involvement in a particular project;
- declaring an interest to a sponsor or third party.

5.7 The actions should be reviewed annually by the relevant staff member (or their nominated deputy) and updated as necessary to ensure they remain relevant.

5.8 The actions should also be reviewed if the reviewer is notified of any material changes to the matter declared.

5.9 A conflict of interest should be avoided unless it can be properly managed using the above strategies. For example, in extreme cases, it might be necessary for an individual to resign one of the positions which is creating the conflict.

5.10 If the individual is not clear as to the course of action to be taken, they should contact the Head of Governance and Compliance at governance@metanoia.ac.uk

Monitoring and Review

5.11 The Head of Governance and Compliance is responsible for monitoring the effectiveness of this policy and supporting procedures and will conduct reviews at appropriate intervals. Regular reports will be received by the Board of Trustees in relation to compliance with this policy.