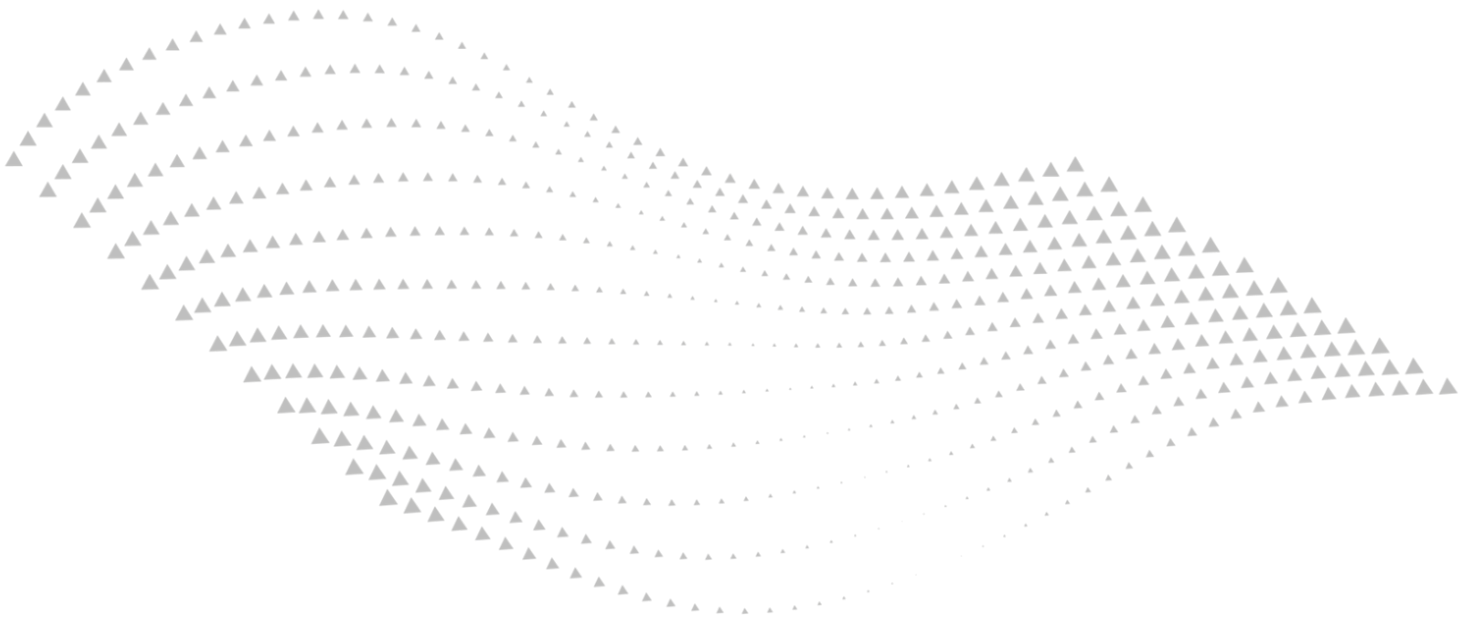


BIMM
UNIVERSITY

A university
for the creative
industries

Declaration of Interest Policy



Last approved: April 2020

Approved by: BIMM University Limited Board

Next review due: April 2024

1. Introduction & Scope

- 1.1. BIMM University is a creative establishment which encourages staff across both academic and professional services areas to pursue excellence in their work. In such a busy and vibrant community, potential conflicts of interest may arise, especially where an individual is in a niche role or has a commitment or position in an outside organisation.
- 1.2. This policy applies to all BIMM University Limited Directors and Executive Management Group members when acting in an official BIMM University capacity. The policy describes the possible personal, social, financial and ethical considerations which may result in an actual or perceived conflict of interest and how they may be managed.
- 1.3. It is essential that BIMM University Limited can demonstrate integrity in all its endeavours, and the intention of this policy is to provide a supportive and transparent approach. A conflict of interest is not, in itself, an indication of any wrongdoing by a Director or Executive Management Group member.
- 1.4. The Office for Students requires that registered providers maintain a Register of Interests to demonstrate proper conduct of Board members and senior post-holders.

2. Conflict of Interest

- 2.1. In the absence of a legal definition of a conflict of interest, it should broadly be considered as a connection which may potentially interfere with an individual's ability to discharge their duties with propriety. The list below, which is not exhaustive, gives examples:
 - Company – any relationship with a named company with which BIMM University Limited might do business, including the company's own subsidiaries, or with any direct competitors;
 - Shareholding above 3% notifiable level for directorships, paid employment, partnership, consultancy or close family connection;
 - Self-employment (accounting for more than 5% of annual income);
 - Property – freehold or leasehold ownership of any properties in which the Institute might have an interest.
 - Charities – trusteeship or governorship or employment with;
 - Public appointments – paid or unpaid;
 - Memberships – professional bodies, trade or other associations, external bodies;
 - Close family links to any of the above.
- 2.2. BIMM University Limited Directors and Executive Management Group members must avoid placing themselves under any obligation to people or organisations that might inappropriately try to influence them in their work for BIMM University Limited. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

3. Register of Interests

- 3.1. The Office for Students requires that registered providers maintain and publish a Register of Interests to demonstrate proper conduct of Board members and senior post-holders.
- 3.2. The Register of Interests is made publicly available on the BIMM University website.

- 3.3. The Register is annually reviewed by the Clerk to the Board, who will contact the appropriate individuals to seek declarations and confirm any current or potential conflicts of interests.
- 3.4. Disclosures may be made at any time and should be made, where possible, before an individual has engaged in any activity. These should be declared in writing to the Clerk to the Board.
- 3.5. Where a Director or Executive Management Group member believes the conflict of interest no longer exists, they are advised to put this in writing to the Clerk to the Board, requesting that their disclosure is removed from the Register of Interests.

4. Terms of Appointments

- 4.1. BIMM University Limited will ensure that Directors and Executive Management Group members are aware, under the terms of their appointment, that they:
 - 4.1.1. will act responsibly and in the best interests of BIMM University Limited at all times;
 - 4.1.2. must declare their interests on the published Register of Interests.

5. Managing a Conflict of Interest for Directors or Executive Management Group members

- 5.1. BIMM University Limited Directors or Executive Management Group members who identify a perceived or actual conflict of interest relating to an item of BIMM University Limited Board or Executive Management Group business should raise this with the Clerk to the Board in the first instance who, in consultation with the Chair of the Board and/or the Chief Executive Officer & Head of Institution, will determine whether the declaration should be formally recorded.
- 5.2. Where circumstances require that a conflict of interest is managed, the approach and mitigation should be formally recorded. Any particularly difficult matters, or where agreement about the mitigating approach cannot be reached, should be referred to the Chair of the Board, who will make a final decision.
- 5.3. To ensure there is no undue pressure in the decision-making process and in the conduct of BIMM University business, where a Director or Executive Management Group member has an interest in a matter under consideration, they must declare it and abstain from the discussion and any associated vote. This declaration should be noted in the formal record of the meeting.
- 5.4. Where several Directors or Executive Management Group members are affected by the same conflict of interest, it may be appropriate that the matter is referred to a separate committee.