

Board of Directors

Declaration of Interests Policy

1. Purpose

This policy ensures transparency, integrity, and accountability in the decision-making processes of the Board of Directors by managing actual, potential or perceived conflicts of interest.

2. Scope

The policy applies toⁱ:

- All members of the Board of Directors, including Associate Directors
- Members of the Executive Leadership Team (ELT)
- Deans and Directors
- Standing Attendees at Board Meetings (Chaplain, Chancellor, MSU Deputy President)

3. Principles

The policy is guided by:

- The Seven Principles of Public Life (Nolan Principles)ⁱⁱ
- The Charity Commission's guidance on conflicts of interestⁱⁱⁱ
- The Committee of University Chairs (CUC) Higher Education Code of Governance^{iv}
- The University's Articles of Association^v

4. Definition of Interests

Interests that must be declared include (but are not limited to):

- Financial interests: employment, shareholdings, directorships, contracts
- Non-financial interests: memberships, trusteeships, volunteer roles
- Personal relationships: family or close personal connections with staff, students, or suppliers, as set out in Appendix 1 of the Declaration of Interests form. It is the responsibility of those completing the form to consider all potential interests and capture these clearly, as appropriate. A nil declaration is taken to mean that all related parties' interests have been considered and there are nil to report.
- Institutional affiliations: roles in other HEIs or sector bodies

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5. Register of Interests

Those personnel indicated under 'Scope' must complete a Declaration of Interests Form annually. The form is appended to this policy. The Register of Interests is published on the University website^{vi} and also disseminated within the meeting pack of Board meetings.

The Register is maintained by the Governance Services Manager and reviewed on a rolling basis. It is the responsibility of those indicated under 'Scope' to submit an update promptly if their circumstances change.

6. Declaration at Meetings

Interests relevant to agenda items must be declared at the start of each meeting. The Chair will determine appropriate action, which may include:

- Withdrawal from discussion
- Abstention from voting
- Full withdrawal from the meeting for that item

7. Confidentiality and Publication

The Register of Interests is publicly available on the University's website, except for sensitive personal data. Individuals may request that certain information be withheld from publication, subject to approval by the Chair and Governance Services Manager.

8. Breaches of Policy

Failure to declare interests may result in:

- Referral to the Chair of the Board
- Review by the Governance, Strategy and Foresight Committee
- Potential removal from the Board under the University's Articles of Association

9. Review

This policy will be reviewed every three years or sooner if required by changes in legislation or governance standards.

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ⁱ All those named under ‘Scope’ are required to complete a declaration of interests form primarily to uphold integrity and transparency, manage potential conflicts, and safeguard the reputation of both the individual and the institution. This process ensures that decisions are made objectively and in the best interests of the university, especially given that universities are public bodies receiving public and other funds.

ⁱⁱ <https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>

ⁱⁱⁱ <https://www.gov.uk/government/publications/conflicts-of-interest-a-guide-for-charity-trustees-cc29/conflicts-of-interest-a-guide-for-charity-trustees>

^{iv} https://www.universitychairs.ac.uk/wp-content/files/2026/07/CUC-Code-of-Higher-Education-Governance-2026_150626.pdf

See Culture and Behaviours provisions 9 and 11.

^v Article 19: On an annual basis each member of the Governing Body shall receive and be required to complete a statement of interests and update any other personal details.

^{vi} <https://www.marjon.ac.uk/about-marjon/governance--management/university-board-of-governors/our-governors/>