



STRANMILLIS UNIVERSITY COLLEGE
A College of Queen's University Belfast

CODE OF CONDUCT FOR MEMBERS OF THE GOVERNING BODY

Revised September 2024

CODE OF CONDUCT FOR MEMBERS OF THE STRANMILLIS UNIVERSITY COLLEGE GOVERNING BODY

1. Introduction

- 1.1 This document sets out a code of conduct for Governors. It is based on Guidance issued by the Department of Finance & Personnel (DFP) (now the Department of Finance (DoF)) in April 2014.
- 1.2 As a public office holder, your behaviour and actions must be governed by the principles set out in this Code of Conduct. It is therefore your responsibility to ensure that you are familiar with, and comply with, all the relevant provisions of the Code.

2. Key Principles of Public Life

- 2.1 The key principles upon which this Code of Conduct is based are the Seven Principles of Public Life. These are:

Selflessness

You should act solely in terms of the public interest. You should not do so in order to gain financial or other material benefits for yourself, your family or your friends.

Integrity

You should not place yourself under any financial or other obligation to outside individuals or organisations that might, or might be perceived to, influence you in the performance of your duties.

Objectivity

You should act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability

You are accountable for your decisions and actions to the public and must submit yourself to whatever scrutiny is appropriate for your office.

Openness

You should be as open as possible about the decisions and actions that you take. You should give reasons for your decisions and restrict information only when the wider public interest clearly demands.

Honesty

You have a duty to declare any private interests relating to your public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

You should promote and support these principles by leadership and example.

- 2.2 These principles should inform your actions and decisions as a Governing Body Member.
- 3. Relationship with the Sponsor Department**
- 3.1 The Minister and Permanent Secretary at the Department for the Economy (DfE) are answerable to the NI Assembly for the policies and performance of all public bodies sponsored by DfE, including their use of resources and the policy framework within which they operate. The respective roles of DfE and the Governing Body of the University College are set out in the Financial Memorandum, specifying the terms on which the University College receives and spends its funds.
- 4. Communication with the Minister for the Economy**
- 4.1 Communications between the Governing Body and the Minister will normally be through the Chair, except where the Governing Body has agreed that an individual Member should act on its behalf. Nevertheless, individual Members have the right of access to the Minister on any matter which they believe raises important issues relating to their duties as Members of the Governing Body. In such cases, the agreement of the rest of the Governing Body would normally be sought.
- 5. Day-To-Day Business between the University College and DfE**
- 5.1 Day-to-day business between the University College and DfE will be conducted by the Principal or another member of staff who is authorised to act on behalf of the Governing Body.
- 6. Induction of New Members of the Governing Body**
- 6.1 The Chair should ensure that all Members of the Governing Body, when taking up office, are fully briefed on the terms of their appointment, and on their duties and responsibilities. They should also be given a copy of this Code of Conduct; other relevant background material such as the Instrument and Articles of Government, the University College's Financial Memorandum; its latest corporate plan and annual reports and financial statements; notes describing the University College's organisational structure and basis of operation; and the standing orders, rules and procedures of the Governing Body as well as the Treasury Handbook 'Regularity & Propriety'. The Chair should encourage new Members of the Governing Body to attend an induction course on the duties of members of public bodies, or some other suitable induction programme.
- 7. Leadership of the University College**
- 7.1 The Chair has particular responsibility, along with the Principal, for providing effective strategic leadership of the University College on matters such as:
- a. formulating the Governing Body's strategy for discharging its statutory duties.
 - b. representing the views of the Governing Body to the general public.

- c. ensuring that the Governing Body, in reaching decisions, takes proper account of guidance provided by the Minister and the Department for the Economy (DfE) and also the Department of Education (DE).
- d. ensuring the Governing Body receives and reviews regular financial information concerning the management of the College; is informed in a timely manner of any concerns about the activities of the College; and provides positive assurance to DfE that appropriate action has been taken on such concerns.
- e. encouraging high standards of propriety, and promoting effective, efficient and economical use of staff and other resources throughout the University College.
- f. ensuring that DfE is kept informed of any changes that are likely to impact on the strategic direction of the College or on the attainability of its targets, and determining the steps needed to deal with such changes.
- g. constructively challenging the College's executive team in their planning, target setting and delivery of performance, while also providing support.
- h. setting performance objectives and remuneration terms for the Principal / Chief Executive and Directors, which give due weight to the proper management of public monies.

8. Governing Body Meetings

- 8.1 The Chair should ensure that the Governing Body meets at regular intervals throughout the year in line with its Operating Framework; and that minutes of meetings accurately record decisions taken and, where appropriate, the views of individual Members of the Governing Body.
- 8.2 All Governing Body Members are expected to conduct themselves in a professional manner at meetings, to demonstrate courtesy for others and to listen to and acknowledge others' points of view.

9. Corporate Responsibilities of Members of the Governing Body.

- 9.1 Members of the Governing Body have corporate responsibility for ensuring that the University College complies with any statutory or administrative requirements for the use of public funds, including avoiding waste and extravagance and the proper custody of assets which are publicly funded. Other important responsibilities of Members of the Governing Body include:
 - a. establishing the overall strategic direction of the organisation within the policy and resources framework agreed with the DfE and DE.
 - b. ensuring that the University College follows the principles of openness, which includes giving prompt responses to public requests for information including compliance with the Freedom of Information Act 2000.
 - c. ensuring that the University College operates sound environmental policies and practices.
 - d. ensuring that high standards of corporate governance are observed at all times, including using the Audit and Risk Assurance Committee to assist the Governing Body to address the key financial and other risks facing the College.

- e. overseeing the delivery of planned results by monitoring performance against agreed strategic objectives and targets.
- f. ensuring that, in reaching decisions, the University College has taken into account any guidance issued by DfE and DE.
- g. ensuring that the University College operates within the limits of its statutory authority, the delegated authority agreed with the DfE and in accordance with any other conditions relating to the use of public funds.

10. Responsibilities of Individual Members of the Governing Body

10.1 Individual Members of the Governing Body should also be aware of their wider responsibilities as Members of the Governing Body.

10.2 Members of the Governing Body must:

- a. undertake on appointment to comply at all times with this Code of Conduct and with rules relating to the use of public funds.
- b. act in good faith and in the best interests of the University College.
- c. not misuse information gained in the course of their public service for personal gain or for political purposes, nor seek to use the opportunity of public service to promote their private interests or those of connected persons, firms, businesses or other organisations. Members must also not disclose any information which is confidential in nature or which is provided in confidence, without authority. This duty continues to apply after a Member has left the Governing Body.
- d. not misuse College resources for personal gain or for political purposes. Use of such resources must be in line with the College's rules on their usage.
- e. comply with the rules on claiming of expenses, and minor out of pocket costs, taxation of which should be in line with HMRC guidelines. The College pays mileage to staff and Governors at 45p per mile which is the maximum permitted by HMRC before any tax would be payable by the recipient of the expenses. Thus there are no tax implications for Governors re mileage paid to them by Stranmillis. In addition, there are no tax implications for minor out of pocket expenses.

11. Political Activity

11.1 In a public role Members should be, and be seen to be, politically impartial and even-handed in all dealings with political parties. Members of the Governing Body are expected not to occupy paid party political posts or hold particularly sensitive or high profile unpaid roles in a political party. On matters related directly to the work of the College, Members should also not make political statements or engage in any other political activity.

11.2 Subject to the above, Members may engage in political activity but should, at all times, remain conscious of their responsibilities as Governing Body Members and exercise proper discretion. Members should inform the Chair and DfE before undertaking any significant political activity.

12. Employment and Appointments

- 12.1 Should a Member of the Governing Body wish to take up new employment or appointments during their term of office with the College, they must inform the Chair and DfE. Formal consideration will be given to whether such additional appointments are appropriate given in the context of a Member's current appointment.

13. Removal from Office

- 13.1 A Member of the Governing Body may be removed from office under the provisions of paragraph 14 of the Instrument of Government and/or Schedule 2 of the Colleges of Education (NI) Order 2005.

14. Personal Liability of Governing Body Members

- 14.1 Although any legal proceedings initiated by a third party are likely to be brought against the University College, in exceptional cases proceedings (civil or criminal) may be brought against the Chair or other individual Members of the Governing Body. For example, a Member of the Governing Body may be personally liable if he or she makes a fraudulent or negligent statement which results in loss to a third party. Members of the Governing Body who misuse information gained by virtue of their position may be liable for breach of confidence under common law or may commit a criminal offence under insider dealing legislation.
- 14.2 However, individual Members of the Governing Body who act honestly, reasonably, in good faith and without negligence should not normally incur any liability in an individual capacity, provided they are acting in furtherance of their Governing Body functions and save where a person has acted recklessly. Details of the University College's liability insurance can be obtained from the Secretary of the Governing Body.

15. Professional Advice

- 15.1 Members of the Governing Body may wish to seek legal or other independent professional advice in the furtherance of their duties. This will be obtained by the Secretary on the Governing Body's behalf.

16. Financial and Other Interests of Members of the Governing Body

- 16.1 Members of the Governing Body should declare any personal or business interests which may conflict with their responsibilities. Guidance on declaring and registering interests is included at Annex A.
- 16.2 Members must at all times adhere to the College Policy on Acceptance of Gifts and Hospitality.

17. Delegation

- 17.1 With the exception of the Principal and Staff Representatives, Members of the Governing Body serve on a part-time basis. Responsibility for day-to-day matters is therefore delegated to staff so far as is practicable, within a clearly understood framework of control.
- 17.2 The Governing Body may also decide to delegate, where it has power to do so, responsibility for specified matters to individual Members or Committees of the University College. Decisions taken under delegated powers should be reported to the next meeting of the Governing Body and recorded in the minutes thereof. The Governing Body should issue guidance covering those matters delegated to staff and those reserved for decision by the Governing Body. The latter are likely to include issues of corporate strategy, key strategic objectives and targets, major decisions involving the use of financial and other resources and personnel issues including key appointments and standards of conduct.

18. Strategic Planning and Control

- 18.1 The Governing Body is responsible for overseeing the production of a corporate plan. Preparing the corporate plan provides an opportunity for the University College to determine its key strategic objectives and targets; and to agree with the Minister or officials on his or her behalf, the policy and resources framework within which the University College will discharge its duties.

19. Openness and Transparency

- 19.1 Members of the Governing Body and University College management should conduct all their dealings with the public in an open and responsible way. They should take account of the Standard of Best Practice for Openness in Executive NDPBs and NHS bodies in the 'First Report of the Committee on Standards in Public Life' (Cm 2850-I). Wherever possible, the Governing Body should provide for access to records of their decisions and should publicise the arrangements made.
- 19.2 Members of the Governing Body are responsible for providing the NI Assembly (including its Committees) and the public with as full information as may be reasonably requested concerning their policy decisions and actions. They should be able to demonstrate that they are using resources to good effect, with probity, and without grounds for criticism that public funds are being used for private, partisan or party political purposes. Members of the Governing Body and University College staff should conduct all their dealings with the public in an open and responsible way. Members should act consistently with the nature of the University College's business and with the need for confidentiality on commercial, data protection or other grounds, subject to the right of the NI Assembly and/or Parliament including their Committees and the Comptroller and Auditor General to obtain information.

20. Annual Report and Financial Statements

- 20.1 As part of its responsibilities for the stewardship of public funds, the Governing Body should ensure that a full statement of the use of such resources is included in the University College's Annual Report and Financial Statements. These should be prepared in accordance with the Accounts Direction issued by DfE, the 2019 Statement of Recommended Practice: Accounting for Further and Higher Education, Financial Reporting Standards (FRS102) and the Financial Memorandum agreed between DfE and the University College.
- 20.2 The University College's Annual Report and Financial Statements should be well publicised including through the College's website. The annual report should contain a summary of the annual accounts and details of how to obtain the full accounts. It should also state whether the report on the annual accounts is qualified and provide details if this is the case.

21. The Role of the Accounting Officer

- 21.1 The Principal has responsibility, under the Governing Body, for the overall organisation, management, and staffing of the University College and for its procedures in financial and other matters, including conduct and discipline. This involves promoting, by leadership and example, the values embodied in the Nolan Committee's Seven Principles of Public Life. Members of the Governing Body should support the Principal in undertaking this responsibility.
- 21.2 The Principal is the University College's designated Accounting Officer. He/she is responsible to the NI Assembly, Parliament and the Accounting Officer of the DfE for the resources under his/her control. He/she has personal responsibility for the propriety and regularity of the public finances for which the University College is answerable; for keeping proper accounts; for prudent and economical administration; for avoidance of waste and extravagance; and for the effective and efficient use of all the resources in the University College's charge. The Accounting Officer has a responsibility to see that appropriate advice is tendered to the Governing Body on all these matters.
- 21.3 More detailed guidance on the role of an Accounting Officer is set out in the NDPB Accounting Officer Memorandum issued by DFP (now the Department of Finance), which covers appearances before the Public Accounts Committee of the NI Assembly and of the House of Commons. A Public Accounts Committee may invite a Member to give evidence to the Committee. All Governing Body Members should ensure that they have a copy of this document. The Treasury's handbook 'Regularity and Propriety', describes what these concepts mean in a financial context. Although the handbook is intended primarily for Accounting Officers, Governing Body Members should also familiarise themselves with it.

22. Attendance at the Audit and Risk Assurance Committee

- 22.1 The Terms of Reference and current membership of the University College's Audit and Risk Assurance Committee are set out in the Governing Body's Operating Framework. As the responsibilities of the Audit and Risk Assurance

Committee will overlap with those of the Accounting Officer, he or she should attend all meetings of the Audit and Risk Assurance Committee.

23. The University College as Employer

23.1 The Governing Body should ensure that:

- a. the University College complies with all relevant employment legislation, and that it employs suitably qualified staff who will discharge their responsibilities in accordance with the high standards expected of staff employed by public bodies. All staff should be familiar with the University College's main aims and objectives.
- b. the University College adopts management practices which use resources in the most effective, efficient and economical manner.
- c. the University College's rules for recruiting and managing staff provide for appointment and advancement on merit, on the basis of equal opportunity for all applicants and staff. In filling senior staff appointments, the Governing Body should satisfy itself that an adequate field of qualified candidates is considered, and should always consider the merits of full open competition, which should always be used for recruitment of external candidates.
- d. the University College's Governing Body and its staff have access to expert advice and suitable training opportunities to enable them to exercise their responsibilities effectively.

24. Staff Code of Conduct

24.1 The Governing Body will adopt a Code of Conduct for its staff which is consistent with good practice and takes account of the University College's own particular characteristics. This will cover or refer to arrangements to enable staff to raise concerns about propriety.

25. Performance of Governors, the Principal and other Senior Staff

25.1 The Chair has responsibility to monitor and appraise all Non-Executive Members of the Governing Body. The Governing Body has a responsibility to monitor the performance of the Principal and other senior staff. Where the terms and conditions of employment of the Principal and other senior members of staff include an entitlement to be considered for performance-related pay, and where such payments are assessed by Members of the Governing Body, the Governing Body should ensure that it has access to the information and advice required to make the necessary judgements.

This Code of Conduct has been adopted by the Governing Body and will be reviewed every 2 years or sooner if required.

Annex A

STRANMILLIS UNIVERSITY COLLEGE

DECLARATION OF INTERESTS BY MEMBERS OF THE GOVERNING BODY

GUIDANCE

1 Conflicts of Interest

- 1.1 Stranmillis University College (the College) is committed to maintaining the highest standards in the conduct of its business. This requires everyone associated with the College to follow the seven principles of public life as set out by the Committee in Standards of Public Life (the Nolan Committee) i.e. selflessness, integrity, objectivity, accountability, openness, honesty and leadership and therefore avoid any conflict arising from their official College duties and their private interests. Failure to do so may provide a risk to the reputation of the College or leave Members open to suspicion of impropriety in their conduct of College business.
- 1.2 In this respect, 'it is central to the proper conduct of College business that Chairpersons and Members of Governing Bodies should act and be perceived to act impartially, and not be influenced in their role as Governors by social or business relationships'. Thus good practice requires that a formal Register of Interests should be established.
- 1.3 A relevant interest, financial or otherwise, which, if publicly known, could be perceived as being likely to interfere with the exercise of a Member's independent judgement should be disclosed to the College.
- 1.4 It is important to bear in mind that the private interest does not have to be your own. You can have a conflict of interest arising from the private interests of family or friends, if they could reasonably be perceived to influence you. Therefore, any Member who has a material interest, either directly or through a family member or friend needs to be considered. As a benchmark, a 'close relative' would usually refer to a spouse or partner, a child, a parent, a sibling, an in-law, and the personal partners of any of these. But more distant relatives should also be considered depending on the closeness of the relationship and the degree to which they could influence your Governing Body duties. The interests of a cousin you never see will be of little consequence; the interests of a cousin with whom you have a close relationship will. Any such interest being declared should describe the interest clearly, including whether it carries either direct or indirect financial interests.
- 1.5 It is not possible to provide an exhaustive list of all the different types of conflict of interest which can arise. Examples of relevant interests in the context of the College would include:

- Directorships, including non-executive directorships of public or private companies likely or possibly seeking to do business with the College or with any of its associated or related companies.
- Membership of public bodies including local councils, the Education Authority, Health Trusts and the Governing Bodies of other educational institutions.
- Employment by public or private companies likely or possibly seeking to do business with the College or with any of its associated or related companies.
- Unremunerated, honorary positions or other positions that might give rise to a conflict of interest or trust.
- Relationship with employees of the College either related to the Member by virtue of being his/her spouse, parent, grandparent, child, grandchild, brother, sister, uncle, aunt, nephew, niece or connected through a close personal relationship.
- Any significant political activity (including office holding, public speaking and candidature for election) undertaken in the five years prior to appointment.

1.6 Not every case is clear-cut. The relationship between a person's duties as a Member of the Governing Body and their private interests can be complex. If in doubt, it is better to err on the side of caution and discuss the possible conflict with the Secretary to the Governing Body in the first instance.

2. Responsibility to Declare

2.1 Once a potential conflict of interest has been identified, the onus is on the individual Governing Body Member to declare the conflict of interest to the Secretary to the Governing Body as soon as it is feasible to do so after it has been identified.

2.2 While the onus is on the individual to identify and declare a conflict of interest, the Chairperson should always be alert to situations which may give rise to conflicts of interest amongst Members and, where necessary, discuss the potential need to make a declaration with the person / persons involved.

3. How to Declare

3.1 Declarations of conflicts of interest should be made formally and in writing using the template attached at **Appendix 1**. This template is designed to capture potential conflicts of interest under various categories.

3.2 Governing Body Members should use their judgement when completing the form. It is not necessary to provide an exhaustive record of all outside interests held by yourself, your close friends and relatives. You should focus on those areas most likely to conflict with your Governing Body duties.

- 3.3 It is important to remember that perception is as important as reality. Even if you feel there is no real risk, you must consider whether a fair-minded observer, acting reasonably, could perceive that a conflict of interest exists. If this is the case, you must declare the conflict of interest.
- 3.4 If a Member intends to disclose the personal data of another person in their declaration form, they should make the individual aware of this and provide them with a copy of the Privacy Notice at **Appendix 2**.

Role of the Secretary to the Governing Body in Consultation with the Chair

- 3.5 The role of the Secretary to the Governing Body will be to consider, in consultation with the Chair, how best to deal with the declared conflict, and ultimately to record what action, if any, needs to be taken, including the rationale.

When to Declare

- 3.6 All Governing Body Members should make a formal declaration of interests using the form at **Appendix 1** at three main stages as outlined below:
- 3.7 **Upon appointment** – New appointees will be required to complete a Conflicts of Interests Declaration form disclosing any conflicts of interest or confirming they have none.
- 3.8 **Annually** – All Governing Body Members will be prompted annually by the Secretary to the Governing Body to complete an annual Declaration of Interests form which will be recorded on a central Declaration of Interests Register. The Secretary will review the Register with the Chair to decide if any action is necessary in respect to the interests recorded.
- 3.9 **‘As and when’** – Our private interests are not static. Members should be mindful of any changes in their circumstances throughout the year which could give rise to a conflict of interest. Should one arise, a new conflicts of interest declaration form should be completed immediately and submitted to the Secretary to the Governing Body for appropriate action. **Members should not wait until the next annual declaration is due.**

Conduct at Meetings

- 3.10 In addition to the three main stages outlined above, Members should declare any identified conflicts of interests in relation to specific meetings at the outset, depending on the purpose, agenda, papers, etc. Appropriate action (e.g. recusal from certain parts of the meeting) should be agreed by the Chair and recorded in the minutes. It is not normally necessary to complete a formal conflicts of interest declaration template in such instances as the conflict will relate to a self-contained meeting rather than the Member’s ongoing duties; however, if it does relate to their ongoing duties a form should be completed.

3.11. The Principal, the Staff Members and the Student Member shall, unless invited to remain by a resolution of the other Members present, withdraw from any meeting of the Governing Body, including any Committee established by the Governing Body, where any of the following circumstances apply-

In the case of the Principal, in relation to consideration of:

- (a) his or her salary or terms and conditions of his or her employment;
- (b) his or her appraisal;
- (c) his or her retirement;
- (d) his or her conduct, suspension, dismissal or any other disciplinary matter relating to him or her; or
- (e) the appointment of his or her successor.

In the case of each Staff Member, in relation to consideration of:

- (a) his or her salary or terms and conditions of his or her employment;
- (b) the salary, terms and conditions of employment of any group of employees with which he or she is associated;
- (c) the appointment, promotion, salary, terms and conditions of employment, appraisal, retirement, conduct, suspension, dismissal or any other disciplinary matter relating to any member of staff holding a post of the same level or senior to him or her;
- (d) his or her promotion, conduct, suspension, dismissal or any other disciplinary measure relating to him or her; or
- (e) the appointment of his or her successor.

In the case of the Student Member, in relation to consideration of:

- (a) his or her academic performance;
- (b) any disciplinary measure relating to him or her; or
- (c) the salary, terms and conditions of employment, appraisal, appointment, retirement, promotion, conduct, suspension, dismissal or any other disciplinary measure relating to any employee or prospective employee of the University College.

4. Accounting Practice

4.1. Because the University College is expected to follow UK Generally Accepted Accounting Practice, Members of the Governing Body must facilitate compliance with the need under FRS 102, Section 33 Related Party Disclosures, for related party transactions, where material, to be disclosed in the financial statements. FRS 102, Section 33 includes a definition of what constitutes a third party for this purpose.

5. Membership of Committees

5.1 Members of the Governing Body should not accept positions on University College Committees or Working Groups where a conflict of interest is likely to arise.

6. Data Protection and Confidentiality

- 6.1 The Register of Governing Body interests will be held by the Secretary to the Governing Body.
- 6.2 In accordance with the Instrument of Government, the Register shall be made available during normal office hours at the College to any person wishing to inspect it.

Appendix 1

STRANMILLIS UNIVERSITY COLLEGE

A College of Queen's University Belfast

REGISTER OF INTERESTS: DECLARATION BY MEMBERS OF THE GOVERNING BODY

Surname:

Forename(s):

Address:

Date of Appointment to the Governing Body:

Principal Occupation:

Declaration of Interests (including those of a partner, spouse or close relative or friend) which may give rise to a conflict of interest:

Directorships (including non-executive):
Membership of public bodies (remunerated or unremunerated)
Employment (by a public or private company, Charity or Voluntary organisation)
Self-Employment
Unremunerated, honorary or other positions

Relationship with employees of the College
Position/connections with other educational institutions (including Universities, Further Education Colleges or Schools)
Specific family and/or friends interest in any of the above
Political Activity
Other Interests (Any other interests held by you and/or your family and/or friends)

Declaration

I confirm that I have read, understood and complied with the College's Guidance relating to its Declaration of Interests by Members of the Governing Body. The interests declared above include both direct and indirect interests (i.e. those of a partner, spouse or close relative or friend) and any specific financial interests are shown.

Signed:

Date:

Actions (to be completed by the Secretary to the Governing Body if any Conflicts of Interest have been identified)

What management action will be taken?	
What is rationale for management action taken? (include level of risk)	

Appendix 2

Governing Body Privacy Notice – Conflicts of Interest

Data Controller Name: Stranmillis University College
Address: **Secretary to the Governing Body**
Stranmillis University College
Stranmillis Road
Belfast, BT9 5DY
Telephone: 02890 384438
Email: I.armstrong@stran.ac.uk

Why are you processing my personal information?

All Stranmillis University College Governing Body Members must formally declare any potential conflicts of interest as soon as it is feasible to do so after they have identified them, in accordance with College procedures. All conflicts of interest declarations are potentially disclosable under the Freedom of Information Act, subject to relevant exemptions, in the interests of openness and transparency. In other cases, publication may be necessary to foster public confidence by showing that staff in senior management posts have no conflicts of interest. The lawful basis for processing this personal data is that it is necessary for compliance with a legal obligation. The lawful basis for processing any special category (sensitive) data is that it falls under Article 9(b): employment.

What categories of personal data are you processing?

Conflicts of interest declarations require Governing Body Members to provide personal information about their own professional and private lives as well as, potentially, information about the professional and private lives of their family and friends. This includes personal information such as: names; past / present employment or professional activities; shareholdings in companies; and functions in associations / organisations etc.

Potentially in some cases, the information provided could involve special categories of data, for example, information on outside activities or previous employments could for instance include work for a political party, activities in a trade association or a local church. This personal data could indirectly reveal: political opinions; religious or philosophical beliefs; trade union membership; information on professional activities; or sexual orientation of Governing Body Members and their family and friends.

Where do you get personal data from?

Governing Body Members will provide the information when making a declaration, in line with the College's Conflicts of Interest guidance. If you are a relative or friend of a College Governing Body Member, the information will be provided to the Secretary to the Governing Body when making a declaration. The Governing Body Member will inform you that your data is being processed by the College.

Is the personal data I provide shared with anyone else?

The central Register of Governing Body interests will be held by the Secretary to the Governing Body on behalf of the Governing Body and will be stored securely. The information is not routinely shared to external organisations. The minutes of Governing Body meetings, which are published, will record, as appropriate, that an interest has been declared. Personal information will not be recorded in the record of the meeting.

Do you transfer my personal data to other countries?

No.

How long do you keep my personal data?

We will only retain your data for as long as necessary to process in line with the College's Retention and Disposal Schedule.

(If you use automated decision making or profiling) How do you use my personal data to make decisions about me?

Not Applicable.

What rights do I have?

- You have the right to obtain confirmation that your data is being processed, and [access to your personal data](#); and
- You are entitled to have personal data [rectified if it is inaccurate or incomplete](#).

How do I complain if I am not happy?

If you are unhappy with any aspect of this privacy notice, or how your personal information is being processed, please contact the College's Data Protection Officer at:

Data Protection Officer: Head of Human Resources: HR@stran.ac.uk
Telephone number: 028 9038 4480

If you are still not happy, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Tel: 0303 123 1113
Email: casework@ico.org.uk
<https://ico.org.uk/global/contact-us/>