



CSC Conflict of Interest Policy and Procedure

1. Policy

- 1.1 The Chair and other Commissioners should declare any personal or business interests that may conflict with their responsibilities as Commissioners. They should also declare any of the direct or indirect pecuniary interests¹, which are set out in 2.3, and which may conflict with their responsibilities as Commissioners, for inclusion in the Register of Commissioners' Interests.
- 1.2 Commissioners should maintain integrity and professionalism when undertaking their role, acting in the Commission's best interest always. Commissioners must ensure that private interests, whether these are of a personal, financial or political nature, do not impact adversely upon their ability to undertake Commission duties responsibly. Commissioners must not put themselves in a position where their actions, can reasonably be perceived to be open to improper influence.
- 1.3 This policy sets out the way in which Commissioners declare conflicts of interest, the importance of declaring and how breaches will be dealt with. If Commissioners are in any doubt, they should seek advice from the Secretariat or Commission Chair.

2. Background

- 2.1 A conflict of interest arises when an individual could be, or is, influenced by personal considerations during their role. This introduces the risk that decisions are made for the wrong reasons and that financial or other personal reward may adversely influence objectivity, integrity or professional commitment; this can lead to fraud.
- 2.2 Risks to the Commission from conflicts of interest can arise from personal interests within the Commission; between Commissioners and CSC partners; between Commissioners and other organisations, including nominating agencies and Universities; between Commissioners and Secretariat staff and between Commissioners and candidates, prospective or otherwise, or scholars.
- 2.3 Direct or indirect pecuniary interests:
 - remunerated directorships or partnerships;
 - remunerated employment, office, profession or consultancy; and
 - shareholdings in any company where the interest held is 3% or more of the nominal value of the issued share capital of the company.

¹ Indirect pecuniary interests arise from connections with bodies which have a direct pecuniary interest or from being a business partner of, or being employed by, a person with such an interest.

- Involvement with organisations receiving funds or benefits from the Commission, including academic institutions at which scholarships/fellowships are held, where there is an interest as employee, supplier, director, shareholder or board member.

3. Principles

- 3.1 Conflicts of interest adversely affect the Commonwealth Scholarship Commission's reputation, its effectiveness in awarding scholarships and its value for money. Perceived conflicts of interest could be as damaging to the Commission's reputation as actual occurrences, even when the right decisions are being made.
- 3.2 Commissioners must safeguard themselves as well as the Commission against any risk of conflicts of interest. It is particularly important that the Commission actively manages any conflicts of interest because of the value it places on anti-fraud, bribery and corruption best practice.

4. Procedure

- 4.1 All Commissioners must declare any conflict of interest by signing and dating the Register of Interests Form prior to acting on the Commission and every six months whilst a Commissioner. This form is provided on a six-monthly basis by the Secretariat prior to the May and December Commission meetings. Section One of the Register of Interests Form covers Conflicts of Interest.
- 4.2 Non-pecuniary interests and interests of close family members will be declared as they arise and will be included in the Register of Interests². These and any other declarations of interest that arise during Commission meetings will be included in the Register of Interests as and when declarations are made.
- 4.3 Commissioners should make a declaration, even if they are uncertain if it is an actual or a potential Conflict of Interest.
- 4.4 Conflicts of Interests are recorded in the Register of Interests, administered by the Secretariat. Declarations through the Register of Interests Forms include Nil returns. Nil returns are recorded as so to indicate that Commissioners have read and understood the Conflict of Interest Policy and continue to be monitored under it.
- 4.5 The Register of Interests is disseminated to provide Secretariat staff with the conflict of interest information required when providing information to Commissioners and when relying on Commissioners' decision-making.

5. Resolving Conflicts of Interest

- 5.1 At the beginning of each CSC meeting, Committee meeting or selection meeting the Chair should ask that any conflict of interest be declared at the appropriate time. Commissioners will be required to remove themselves from the discussion

² Non-pecuniary interests include those arising from membership of clubs and other organisations. Close family members include personal partners, parents, children (adult and minor), brothers, sisters and the personal partners of these.

or determination of matters in which they have a financial interest.

- 5.2 In matters in which Commissioners have a direct non-financial interest, they should not participate in the discussion or determination of a matter where the interest might suggest a danger of bias.
- 5.3 By way of clarification, a member of a Selection Committee, having fully declared all institutional affiliations, would not normally be prevented from taking part in any discussion, unless this impacts on a particular centre or department in which they are engaged or with which they have a particular relationship.
- 5.4 The meeting Chair will be the final arbiter of the appropriate action.

6. Failure to Declare a Conflict of Interest

- 6.1 If a Commissioner fails to declare a Conflict of Interest (actual, potential or perceived), this will be referred to the Commission Chair. In cases where this concerns the Chair, this will be referred to the Executive Secretary. As Commissioners are appointed by the Secretary of State for Foreign and Commonwealth Affairs, the Commission reserves the option to inform the Foreign, Commonwealth and Development Office (FCDO) where appropriate action will be taken in line with FCDO policy and procedure

7. CSC Secretariat staff:

- 7.1 Secretariat Staff are guided by the Association of Commonwealth Universities' (ACU) Conflict of Interest Policy. The ACU policy applies to Trustees; Senior Executive Team and Senior Management Team as well as senior staff in lead roles on external programmes or contracts. CSC Secretariat staff in such roles and Secretariat staff not in such roles, should follow the best practice and principles of the CSC's Conflict of Interest Policy. Any breach of the ACU Conflict of Interest Policy by Secretariat staff will be dealt with in line with the ACU procedure.

8. Commission Chair and Accounting Officer

- 8.1 The Commission Chair is also the CSC Accounting Officer. Advice on Conflict of Interest concerning the Accounting Officer is included in Managing Public Money.

9. Monitoring and Review

- 9.1 The minutes of meetings will record decisions about conflict of interest (including where there are none), and any withdrawals for items and the reasons for these withdrawals.
- 9.2 The Conflict of Interest Policy and Procedure is regularly reviewed and updated, as is the system for recording and managing conflicts of interest.
- 9.3 The Register of Interests is open to public inspection upon request.