

Management Representations and Register of Interests



General

As an institution in receipt of public and other funds, NCG has a duty to fulfil the highest standards of governance and is committed to the accepted principles of public life (selflessness, integrity, objectivity, accountability, openness, honesty and leadership). It is, therefore, important that if colleagues have a private interest, financial or otherwise, that could overlap with their NCG duties then this interest be declared and managed appropriately. We therefore require new Governors and members to complete a declaration of interest upon appointment and annually thereafter.

Please read this guidance and complete the online form carefully, ensuring that all sections have been completed (where required).

Section 1 - Management Representations

The purpose of the Management Representations section is to receive assurance from you to support the financial statements. Please note, the following points relate to the period of 1st August 2024 to 31st July 2025.

1. Law and Regulation

Please indicate whether you are aware of any breach that could have had any financial impact that has not been reported to NCG Audit Committee. If in doubt, tick 'yes' and provide details.

2. Bribery

Employees and Governors must comply with the Bribery Act 2010. The [Financial Regulations](#) provide details of the required approach and should be consulted for guidance.

The acceptance of gifts is discouraged. Low-value (less than £100) non-cash promotional items such as calendars, diaries and pencils may be accepted. Gifts with a value over £100 must normally be refused; in exceptional cases and with consent from the College Principal / Executive Lead, such gifts may be accepted and donated to a charity of NCG's choice. All employees are required to obtain approval from their line manager before accepting any form of Corporate Hospitality which is offered to them. Where the value of the Corporate Hospitality is likely to be over £100, approval must also be sought from the College Principal / Executive Lead.

The Director of Governance is required to keep an accurate record of all Gifts offered to the Company or to employees of the Company for entry on the Gifts & Hospitality Register.

3. Fraud

Guidance in respect of fraud is contained within ISA (International Standard on Auditing) 240 with Fraud being defined as 'an intentional act by one or more individuals among management, those charged with governance, employees, or third parties, involving the use of deception to obtain an unjust or illegal advantage.' Further to this, it states that 'The primary responsibility for prevention and detection of fraud rests with those charged with governance and with management. Taking into account the definitions of fraud above, you are required to consider whether you are aware of any actual or suspected fraud.'

4. Related Party Transactions

A related party is a person or entity that is related to NCG. NCG must provide the disclosures necessary to draw attention to the possibility that the financial position has been affected by the existence of related parties and the transactions and balances with such parties.

A related party exists where a person, or close member of that person's family, has control or joint control and has significant influence or is a member of key management personnel of the institution. It is the substance of a relationship, rather than the legal form, that should be considered in determining disclosure requirements.

Related parties in institutions are likely to include:

- Members of the governing body, and their 'close family', who hold influential posts in public or private sector organisations with which the institution has transactions;
- Senior staff who hold significant influence on other bodies with which the institution has transactions, e.g. an NHS healthcare trust;
- Associates, collaborations and joint venture entities not fully eliminated on consolidation; and
- Pension schemes for the benefit of employees of either the reporting entity or an entity related to the reporting entity.

Section 2 - Register of Interests

This section asks you to indicate whether you or members of your immediate family have interests that might be perceived by members of the public as likely to interfere with the exercise of independent judgment in matters relating to the business. Personal relationships (such as: a family relationship, a commercial or financial relationship, a romantic relationship or a close personal / social relationship which exists outside of the workplace) must also be declared. If there are any such interests, you should declare these in the form provided. By taking account of such interests, we can demonstrate that decision-making processes are open and transparent and that interests have not influenced the decisions reached. This is to protect individuals as well as the organisation.

The Director of Governance maintains a Register of Interests that is available for inspection by members of the public.