

Conflict of Interest Policy

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Version	Author	Date	Section	Changes summary
2	Sharon Burke	16.02.24	Process	Process diagram added & New Template
3	Gemma Conti	10.05.23		General Update
4	Debbie Carter	08.10.24		Included financial information in the form and DBS changes. Updated policy to reflect joint ownership with Head of Quality and Teaching Excellence.
5	Gemma Conti			Policy moved to new template and separate procedure document created Responsibilities and reporting updated Data protection statement added

Conflict of Interest Policy

1. Introduction / purpose of policy

The aim of this policy is to protect both the College and its staff from any appearance of impropriety. A conflict of interest may occur where the professional responsibilities and position of trust held by an individual or an organisation are compromised by the potential for personal gain or organisational benefit from a situation.

All employees under their contract of employment are required to declare an interest should it arise during their employment. This is required under clause 17.1 of the contract of employment: Exclusivity of Service.

This policy also covers any instances of financial conflicts of interest (e.g., potential financial advantage gained through awarding of contracts or other business arrangements), relationships with other organisations, which may present a conflict with the College, and any changes to their DBS status, as required under the employees' contract of employment.

The purpose of this policy is to ensure that all conflicts of interest are identified and recorded, that they are notified to the relevant College leaders and that, where appropriate, mitigating actions are agreed and put into place. This will ensure that all individuals within the College are protected where there may be an actual, potential, or perception of a conflict of interest and that as an organisation we meet the needs of external organisational requirements by following their policies and procedures in relation to conflicts of interest.

2. Scope

This policy applies to all College employees including agency workers, consultants, self-employed contractors, volunteers, or interns. All of whom are required to recognise and disclose activities that may give rise to any conflict of interest in relation to financial interest, safeguarding, relationships, or the design, delivery and/or awarding of assessments and examinations, to ensure that such conflicts are identified, recorded, and managed effectively.

3. Responsibilities

- It is the duty of every individual covered by this policy to disclose any conflict of interest or any circumstances that might reasonably give rise to the perception of conflict of interest. Apparent or perceived conflicts of interest can be as damaging as actual conflicts of interest.
- Department Heads and Managers are responsible for ensuring all staff are aware of this policy and for ensuring if anything is declared directly to them, they report this to HR. The Head of HR has responsibility for the recording and monitoring of all conflicts of interest
- The Deputy Principal & CEO has responsibility for consideration of conflicts of a financial nature
- The Head of Quality & Teaching Excellence has responsibility for consideration and monitoring of conflicts of an academic nature
- The Head of HR has responsibility for consideration of conflicts of any other nature
- The Exams Officer / Quality & Compliance Leads have responsibility, where applicable, for informing the Awarding Organisation of conflicts of interest, along with the necessary mitigation plans.

4. Reporting

A summary of conflicts of interest and compliance with the policy will be reported to the appropriate authority within the College, this may be SLT and/or Governors as deemed appropriate

Failure to report a conflict of interest may lead to disciplinary action, under the College's disciplinary procedure.

5. Data Protection

The information provided in declarations will be processed in accordance with the data protection principles set out in the Data Protection Act 2018. Data will be processed only to ensure that staff members act in the best interests of the college. The information provided will not be used for any other purpose.

6. Related Policies and Documents

This policy will be used in conjunction the following college policies:

- Staff Code of Conduct
- Disciplinary Procedure
- Safeguarding procedures
- Gifts and Hospitality policy
- Whistleblowing policy
- Malpractice and Maladministration policy
- FE Appeals policy
- HE Appeals policy