

## Conflict of Interest Policy and Procedure

Document No:	<b>2.24</b>	Document Type:	<b>Policy</b>
Formal Review Cycle:	<b>Annual</b>		
Latest Formal Review (month/year):	<b>2022-December</b>	Next Formal Review Due (month/year):	<b>2023-December</b>
Policy Owner:	<b>Quality &amp; Professional Development Manager</b>		
Policy Sponsor:	<b>Director of Quality</b>		

### APPROVAL REQUIRED:

SMT Y/N	Y	SMT Date approved:	01-12-2022		
Governor Y/N	N	Committee:	N/A	Governor Date approved:	N/A

### PUBLICATION:

Website Y/N	<b>Y</b>	Intranet Y/N	<b>Y</b>	Student VLE Y/N	<b>N</b>	Date published:	<b>01-12-2022</b>
Audience:	<b>All staff</b>						
Area/s of Staff Intranet:	<b>Strategies, Policies and Procedures</b>						

### Changes made

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## **1. Introduction**

All members of the College community are required to recognise and disclose activities that may give rise to any Conflict of Interest in relation to the financial interest, the design, delivery and/or awarding of assessments and examinations to ensure that such conflicts are identified, recorded and managed effectively.

A conflict of interest occurs where the professional responsibilities and position of trust held by an individual or an organisation is compromised by the potential for personal gain or organisational benefit from a situation.

The Conflict of Interest Policy and Procedure is designed to protect the integrity of the College and to ensure that all financial and assessment decisions remain fair and properly managed.

## **2. Purpose**

1. 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
2. To ensure all individuals within the College are protected where there may be an actual, potential, or perception of a conflict of interest
3. To ensure that as an organisation we meet the needs of external organisational requirements by following their policies, procedures, and instructions in relation to conflicts of interest

## **3. Responsibility**

1. Overall responsibility for this policy lies with the Quality & Professional Development Manager
2. All staff who are responsible for assessment, invigilation or decisions relating to assessment outcomes are responsible for ensuring compliance to this policy
3. Department Heads and Managers are responsible for informing the Quality and Exams Teams of any conflicts of interest via submission of the completed Conflict of Interest Declaration form at the point of identification
4. Any member of staff employed by the College who may be involved in the awarding of contracts or other business arrangements

## **4. Legislation**

1. There is no directly relevant legislation associated with this procedure
2. The Bribery Act 2010

## **Conflict of Interest Procedure**

### **Introduction**

Craven College is committed to declaring any conflict of interest. The following procedures detail how the objectives of the Conflict of Interest Policy and Procedure will be met and identifies:

1. Key Processes
2. Roles and Responsibilities
3. Objectives
4. Communication
5. Implementation
6. Monitoring
7. Reporting
8. Assessment of Impact
9. Continuous Improvement
10. Associated Documentation

### **1. Key Processes**

1. Information and advice in the case of a possible conflict of interest
2. Guidance on completion and submission of the Conflict of Interest Declaration form
3. Reporting of the conflict of interest

### **2. Roles and Responsibilities**

1. 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 the perception of conflict of interest. Apparent or perceived conflicts of interest can be as damaging as actual conflicts of interest.
2. Department Heads and Managers are responsible for informing the Quality and Exams Teams of any conflicts of interest relating to assessment/exams at the time the conflict first arises or is recognised
3. The Head of Department has the responsibility of securely completing any Conflict of Interest declaration documentation
4. The Exams Officer has responsibility, where applicable, for informing the Awarding Organisation of conflicts of interest, along with the necessary mitigation plans
5. 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)

### **3. Objectives**

The purpose of this policy and procedure is to mitigate risks and safeguard student achievements, as well as staff and College integrity and reputation. It also contributes to the maintenance of College agreements with external organisations, ensuring that we sustain our high quality ethical, reliable and valid assessment of any student at the College.

### **4. Communication**

The following principles are fundamental to the communication of the Conflict of Interest Policy and Procedure:

1. The Conflict of Interest Policy and Procedure will be published on a standardised template
2. The Conflict of Interest Policy and Procedure will be reviewed by the Quality and Professional Development Manager before being escalated to the SMT for approval.
3. This policy and procedure will apply to all College staff involved in financial/tendering decisions, assessing, teaching, instructing, invigilating or who has access to sensitive information within the College. All staff need to be aware in the event of a conflict of interest occurring in order to declare this. It will be the responsibility of the Head of Department/Manager to communicate the content of the policy with staff
4. This document will be available to all staff on the College's intranet site
5. This policy will be reviewed annually

### **5. Implementation**

All Heads of Department/Managers are to ensure that all staff; part-time, salaried, agency or guest are aware of the need to declare any conflict of interest.

1. Identify any staff member, including agency staff, or guest staff who may have a conflict of interest
2. Staff member to complete the Conflict of Interest Declaration form in full and submit to the Department Head/Manager for assessment, and if applicable, for mitigation plans to be put into place
3. Department Head/Manager to send the fully completed form to the Quality & Professional Development Manager for review
4. If applicable, the Department Head/Manager will complete the Awarding Organisation documentation to declare the conflict of interest and send copies of this to the Exams Officer and the Quality & Professional Development Manager

## **5. Monitoring**

1. The documents completed by staff are required to be renewed each year or for as long as the conflict of interest is potentially of impact
2. The records will be kept for a minimum of one year following issue of results for the relevant assessment/examination series

## **6. Reporting**

1. This procedure will be reviewed annually by the Quality & Professional Development Manager and Exams Officer
2. The Exams team will record and disseminate any Awarding Organisation contact in relation to any potential or actual conflict

## **7. Assessment of Impact**

1. The impact of this policy will be assessed by the number and type of conflicts recorded each year

## **8. Continuous Improvement**

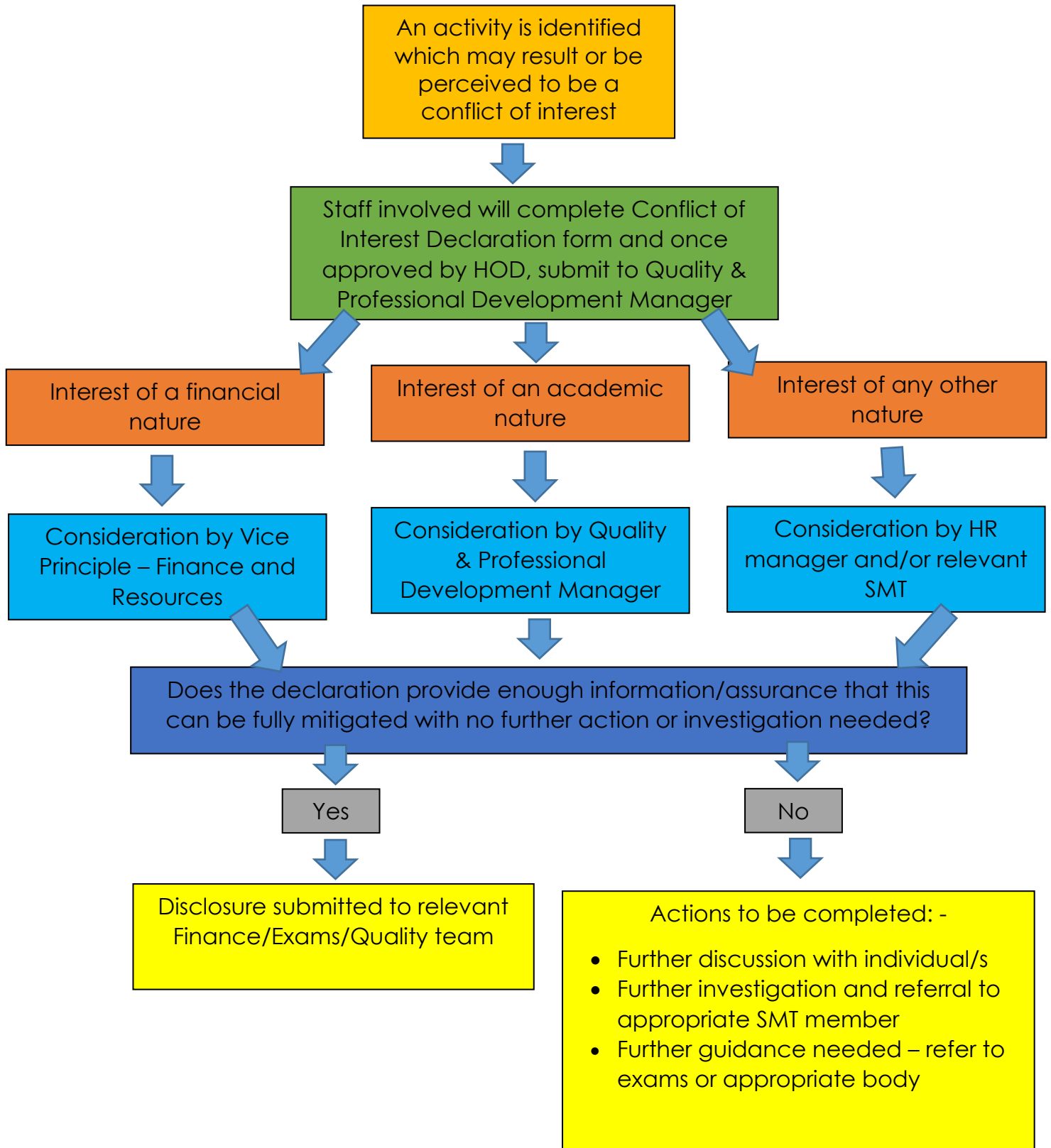
1. Annual review of scope and type of conflict, may lead to revision of this document

## **9. Associated Documentation**

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

1. Staff Code of Conduct
2. Anti-fraud and Anti-bribery policy and procedure
3. Whistleblowing policy
4. Malpractice and Maladministration policy
5. Assessment Appeals procedure

## Appendix 1: Process



## Appendix 2: Conflict of Interest Declaration form

**Section 1:** To be completed by individuals to declare potential conflicts of interest to their Head of Department/Manager

Name:	
Department/Relationship with the College:	
Details of related person:	
Nature and details of the potential conflict of interest:	
Signed:	Date:

**Please forward this form to your Head of Department / Manager.**

**Section 2:** To be completed by Head of Department / Manager

Decision of Head Department / Manager on whether an actual or perceived conflict of interest exists. Please state reasons for decision:	
If a conflict of interest is confirmed, please add details of mitigation plan:	
Signed:	Date:

Once completed, the Head of Department / Manager to forward completed form to the Quality & Professional Development Manager, the Exams Officer and the member of staff.

**Section 4:** To be completed by the Exams Department

<b>Awarding organisation informed (if applicable)</b>	<b>Date:</b>
<b>Form filed securely</b>	<b>Date:</b>
<b>Signed</b>	