

Conflict of Interest Procedure

Title:	Conflict of Interest Procedure	
Document owner:	Head of Quality & Teaching Excellence and Head of HR	
Reviewed/updated by:	Head of Quality & Teaching Excellence	
Version:	1	
Review cycle:	Annual	
Date of update:	November 2025	
Next due:	November 2026	
Approval Level:	SLT	Y via Principal and CEO
	Governors	N
Date Approved:	December 2025	
Publication:	Intranet	Y
	Website	Y
	Students	N

Version	Author	Date	Section	Changes summary
1	Gemma Conti	November 25	Process	Policy moved to new template and separate procedure document created New declaration form

Conflict of Interest Procedure

1. Introduction / purpose of procedure

This procedure outlines the steps to be taken in cases of a conflict of interest. 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.

This procedure should be read alongside the Conflict-of-Interest policy.

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 the 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 employed by Craven College 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 the reporting all declared conflicts of interest
- The Head of Quality & Teaching Excellence has responsibility for the recording and monitoring of all conflicts of interest
- The Deputy Principal has responsibility for consideration of conflicts of a financial nature
- The Head of Quality & Teaching Excellence has responsibility for consideration 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

Heads of Department / Managers are to ensure that all staff; part-time, salaried, agency workers, consultants, self-employed contractors, volunteers, or interns. Are aware of the need to declare any conflict of interest:

1. The conflict-of-interest declaration form is to be completed in full annually and again if a new conflict arises and forwarded to the Head of HR
2. Head of HR to review the conflict on interest and where applicable, forward to the Deputy Principal & CEO or the Quality & Teaching Excellence and Exams teams

Review decisions:

- The disclosure provides enough information / assurance that it can be fully mitigated with no further action or investigation needed. The declaration will be filed and awarding organisation informed if applicable.

Or

- Further discussion is needed with the staff member
- Further investigation and referral to appropriate SLT member is required
- Further guidance needed – refer to awarding organisation or appropriate body

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
- Safeguarding procedures
- Gifts and Hospitality policy
- Whistleblowing policy
- Malpractice and Maladministration policy
- FE Appeals policy
- HE Appeals policy

7. Equality Impact Assessment

This procedure has been assessed for equality impact to ensure it does not discriminate against any protected characteristics.

Appendix 1: Conflict of Interest Declaration form

Name:		
Position within organisation:		
Date of declaration:		
Details of all other employment or voluntary work (paid or unpaid): <i>Please state job title/position, you should include any other College positions</i>		
Company Directorships or Partner: <i>Do you occupy a position as a Director of Partner with any organisation, if so please state.</i>		
Trusteeships: <i>Details of all charities of which you are a trustee</i>		
Membership of organisations, public bodies etc: <i>Details of all organisations or public bodies of which you are a member (this does not include membership of a trade union)</i>		
Financial interests: <i>Details of all known financial interests with the College, such as provision of goods or services – relationship with Contractors</i>		
Details of any accredited qualification you are undertaking at Craven College, for which you are registered as a student. <i>(Please provide full details of the course, including duration)</i>	Details of qualification:	Is this qualification subject to an end of course exam: Yes No
	Declaration of interests of immediate family who are either another employee of the College and /or a student. <i>to include spouse/partner, siblings, children, and parents. Please state the nature of the conflict, the department and site they are based. If a student, please indicate the qualification they are undertaking - please complete table below</i>	Name of family member:
	Relationship to me:	
	Team and where based:	
	Qualification studied (if applicable):	
Since my last DBS check with the college, nothing has changed in relation to my eligibility to work with children and/or vulnerable adults		Agree Disagree

Declaration:

I declare that having read the Conflict of Interest policy and procedure, I have disclosed all my financial, non-financial and personal interests, and those of my immediate family. I understand that it is my responsibility to disclose to my Head of Department any additional interests as they arise.

Signed:	Dated:
---------	--------