

Policy Name	Conflict of Interest Policy
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Content

Scope.....	1
Introduction	1
Policy	2
1. Definition	2
2. Reporting conflicts of interest	2
3. Dealing with conflicts of interest	3

Scope

This policy aims to ensure the successful management of conflicts of interest, or potential conflicts of interest, which may arise specifically from any aspect of the College activities.

All Governors, employees, consultants and contractors must adhere to this policy.

Introduction

The purpose of this policy is to protect the integrity of College decision-making processes at all levels, to enable our stakeholders to have confidence in our integrity.

The requirement for a declaration of any actual/potential conflict of interest will help ensure members of the Board, Committees or the Senior Management Team do not unduly influence decisions so as to ensure a personal or commercial material benefit.

In addition, the requirements in the HR Policies and the Financial Controls Policies are designed to ensure that staff do not receive undue gifts or hospitality that may affect their judgment or be considered by others as impacting their judgment.

The document outlines the approach to identifying and monitoring all actual/potential conflicts of interest that may affect the College activities now and in the foreseeable future.

Policy

1. Definition

A conflict of interest exists where the interests of a governor, employee, consultant or contractor could lead them to take actions or make decisions which are contrary to the interests of the College. This may include the decision-making at any level including the development, delivery and award of regulated qualifications in accordance with regulatory requirements.

2. Reporting conflicts of interest

Governors, employees, consultants and contractors will be made aware of the policy prior to appointment. Enquiries will be made to ensure that there is no conflict of interests in relation to their work for the College.

Upon appointment each governor, employee, consultant or contractor, will make a full, written disclosure of interests, such as relationships, business interests and posts held that could potentially result in a conflict of interest.

Any actual/potential conflicts of interest must be raised with the Clerk to the Corporation in the case of Governors, their line manager in the case of staff, and the person responsible for their appointment in the case of consultants and contractors.

The actual/potential conflict of interest must then be recorded together with the steps taken, or planned, to monitor and manage the conflict.

Declarations must also be made orally at any meetings where a conflict of interest may arise.

A register of conflicts of interest will be maintained by the Clerk of the Corporation for Governors and Senior Post Holders and by Human Resources for all other conflicts. This includes a copy of the written disclosure and any management steps taken.

If someone is unsure whether to declare a matter as a conflict of interest the College's policy is "when in doubt, declare".

In certain circumstances an individual may wish to report a potential conflict of interest confidentially. In this case the process set out in the Whistleblowing Policy will be used for raising concerns.

3. Dealing with conflicts of interest

Investigations into possible conflicts of interest will be carried out, where considered appropriate, by an appropriate person, who is independent, and do not have a vested interest in the outcome.