

Conflict of Interest Policy

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Published on website	Yes	Related policies and/or procedures	Staff Handbook Data Protection Policy Equality and Diversity Policy Complaints Policy Grievance Procedures

1. Aim of the Policy:

- 1.1. Conflicts of interest may arise where an individual's personal or family interests and/or loyalties conflict with those of the College. These interests may be academic, financial or emotional. Such conflicts may create problems, as they can:
- 1.1.1. inhibit free discussion;
 - 1.1.2. result in decisions, or actions, that are not in the best interests of the College;
 - 1.1.3. risk the impression that the College has acted improperly.
- 1.2. The aim of this policy is to protect the College and the individuals concerned from any appearance of impropriety.

2. Contracts and Agreements:

- 2.1. Staff have an obligation to disclose in writing to a responsible person associated with the contract or agreement that they believe that a conflict of interest does or could exist in respect of their involvement in the contract or agreement. If a staff member who is negotiating an agreement on behalf of the College has an interest such that it could appear to a reasonable observer that negotiations are biased, the staff member should disclose that interest.

3. Management and Supervisory Roles:

- 3.1. Staff members who hold a line management or supervisory role have an obligation to make a disclosure in all cases where they find themselves involved in:
- (a) the recruitment, selection, or appointment of an applicant; or
 - (b) the appraisal, promotion, discipline, or other management activity of a staff member; or
 - (c) the authorisation of any financial payments (e.g. time sheets, expenses claims, salary changes) for a staff member with whom they have a personal relationship, or who is known to them privately through their commercial interest, or whose known religious/ethical views or strong personal values may be perceived to be in conflict with their own.
- 3.2. Disclosure must be made in all cases except where there has been pre-authorisation by the Principal or the Principal's nominee.

4. Academic Relationships:

- 4.1. Academic staff members have an obligation to make a disclosure in all cases where they find themselves involved in the recruitment, progression and assessment of students with whom they have a personal relationship, or who is known to them privately through their commercial interest, or whose known religious/ethical views or strong personal values may be perceived to be in conflict with their own.
- 4.2. Disclosure must be made in all cases except where there has been pre-authorisation by the Principal or the Principal's nominee.

5. Disclosure of Other Employment:

- 5.1. In specific cases, there may be benefits to both staff and the College for staff to hold other employment simultaneously with their College employment. However, there also exists a potential for a perceived or real conflict of interest or commitment where more than one employment relationship exists at any particular time.

6. What to do if a Conflict of Interest arises:

- 6.1. Whenever a member of the Board of Governance, staff or student has a personal interest in a matter to be discussed at a meeting of the College or in a prospective commercial or financial dealing with an outside body, the individual concerned must, in the case of matters arising at meetings:
- 6.1.1. declare an interest at or before discussion begins on the matter;
 - 6.1.2. withdraw from the meeting for that item unless expressly invited to remain in order to provide information;

- 6.1.3. not be counted in the quorum for that part of the meeting;
- 6.1.4. withdraw during the vote and have no vote on the matter.

6.2. In other dealings where individuals are acting on their own or in collaboration with others outside the context of a meeting, before concluding any arrangement, the matter must be discussed with an appropriate College Officer, line manager or students' representative.

7. Penalties for Non-Disclosure of a Conflict of Interest:

7.1. It is an individual's responsibility to raise concerns relating to conflicts of interest directly with an appropriate person within the College. In case of uncertainty, those affected should consult with an appropriate person at the earliest possible occasion. If a conflict of interest cannot be resolved by discussion the College will set up a panel to advise the parties.

7.2. Failure to disclose an actual or potential conflict of interest could result in dismissal for gross misconduct.

8. Data Protection:

8.1. Any information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 2018. Data will be processed only to ensure that members of the Board of Governance and others within the scope of this policy act in the best interests of the College. The information provided will not be used for any other purpose.