



# Conflict of Interest Policy

# CONFLICT OF INTEREST POLICY

## Purpose of the Policy

The purpose of this policy is to provide guidance to all staff, subcontractors, and any other relevant individuals on handling possible conflicts of interest that may arise as a result of their roles as teachers, training consultants, managers, assessors, invigilators, internal verifiers, or assessment-related administrators. This policy applies to all staff or other individuals whenever they interact or potentially interact with any of the College's teaching, learning and assessment-related functions. This policy:

- Defines what is meant by conflict of interest in these circumstances.
- Describes the role of conflict of interest in the context of working for the College.
- Sets out which conflicts can be managed and how they should be managed, and those which are considered unmanageable and therefore cannot be allowed.
- Identifies potential conflict of interest situations, some of which are not obvious and identify the action needed.

**The most important feature of the policy is the instruction that individuals should always disclose an activity if there is any doubt about whether it represents a conflict of interest.**

## 1. Introduction

West Herts College Group is an organisation with a national reputation for the delivery of high-quality teaching, learning and assessment leading to a wide variety of qualifications. Working in partnership with a range of awarding bodies, the College is required to identify and manage all conflicts of interest that might detrimentally impact on standards of, or public confidence in, the College's educational and training provision or the reputations of partner awarding bodies. The College's status as a publicly funded body makes it of considerable public interest. Consequently, it is important that all individuals and organisations with which the College has dealings are confident that all of its teaching, learning and assessment-related operations are free from improper influence.

## 2. **Scope**

This policy applies to all staff and other individuals who interact or potentially interact with the teaching, learning and assessment-related work of the College. This includes individuals involved with all aspects of teaching, learning, devising, setting, marking, administering, assessing, invigilating, internally verifying or any other activity connected with the teaching, learning and assessment of learners and associated by supporting resources and services.

The individuals falling within the scope of this policy include full-time, part-time, pro rata, subcontracted and HPL staff of the College and any associate staff including external examiners. The content of the policy cannot cover every potential conflict and must be interpreted in the light of the particular circumstances of each case.

## 3. **What is a Conflict of Interest?**

Conflict of interest is a situation in which an individual or organisation has competing interests or loyalties. Conflicts of interest can arise in a variety of circumstances, for example:

- An individual whose personal interests conflict with his/her professional position
- An individual scheduled to teach, assess, invigilate or internally verify the work of friends, relatives, or colleagues undertaking CPD within the college
- When one part of the College follows a procedure that conflicts with the organisation's official policy and the requirements of its awarding bodies
- An individual undertaking assessment for the college in their own workplace

## 4. **Roles, responsibilities, and associated procedures to be followed in the event of an actual or perceived conflict of interest**

All staff have a responsibility to be aware of the potential for a conflict of interest. It is possible that staff working in any role might encounter potential conflicts of interest from time to time. Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact on standards of, or public confidence in, the College's educational and training provision or the reputations of partner awarding bodies or stakeholders. Staff can find themselves in potential conflicts of interest situations because they are not clear what the

correct, auditable processes and procedures are.

- The Conflict-of-Interest policy is a requirement of the induction of all new teachers, assessors, invigilators, internal verifiers and assessment-related administration staff.
- Any day-to-day concerns identified by an individual should be raised with their line manager at the earliest opportunity.
- Where there is a notified potential conflict of interest for an individual, the individual and line manager must document this carefully, together with those activities that must be avoided to prevent the College or any of its partner awarding bodies being brought into disrepute.
- In the event of a conflict of interest arising the staff member and line manager should complete a conflict-of-interest statement, this should be signed by both the individual staff member and the line manager.

This should then be brought to the attention of the Deputy Principal, appropriate Curriculum Director and Quality Manager to identify actions to be taken and be retained for audit purposes.

Any concerns that the individual feels are urgent should be communicated immediately to the Head of Quality and may be done so in confidence. It is an individual's right to raise concerns relating to conflict of interest directly with the Head of Quality and to receive a response to their concerns.

As and when the situation arises, teachers, managers, assessors, invigilators, internal verifiers, and administrators of assessment-related materials must notify their line managers of any learners enrolled at the College who are family members, other relatives or close friends.

## **5. Handling Potential Conflicts of Interest in Specific Areas and Functions**

The following are examples of conflicts or potential conflicts of interest from different areas of the College. These notes are intended to be helpful to staff in making decisions that relate to potential conflict of interest situations in their day-to-day work.

- If a teaching member of staff is involved in any way with the development of a secure assessment for either internal or national use, he or she cannot make use of the knowledge of that assessment in any teaching or learning activity.

- Learning and teaching materials are based on live examination of other assessment materials (although they can make use of past examination of other assessment materials)
- The appointment of all teaching, management, assessors, invigilators, internal verifiers and assessment-related administrative staff is not made against published criteria and on a transparent basis.
- No member of staff is asked to teach, assess, invigilate or internally verify the work of an enrolled learner who is a family member, other relative, close friend or colleague undertaking CPD within the college.
- In the case of any situation where an assessor carries out assessment on behalf of West Herts College Group in an organisation where they are also employed, they must adhere to the relevant assessment strategy and the quality standards set by the CollegeGroup.

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