



## Conflict of Interest Policy

### Definitions

*“a situation in which the concerns or aims of two different parties are incompatible”*

or

*“a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity”*

### Introduction

Brockenhurst College has an obligation to identify and manage potential perceived conflicts of interest within the College. This policy applies to all staff of Brockenhurst College.

The College will, wherever possible, protect the privacy of individual members of staff as far as is reasonable and possible. All investigations will be transparent and clear processes will be followed at all times.

The following statements will help to determine if a member of staff or their actions could result in a Conflict of Interest:

- Relationships between members of staff
- Relationships between staff and learners
- Relationships between/involving a supervisor and/or line manager
- Relationships involving a Governor or a Member of the Senior Management Team of the College
- Relationships involving members of staff and suppliers of goods or services

### Relationships between members of staff

Personal relationships are not a bar to employment at Brockenhurst College. However, members of staff are required to declare formally any personal relationships with:

- existing members of staff
- existing learners
- individuals with links with the college, e.g. suppliers, contractors
- a Register of Interest needs to be completed and filed with the Clerk to the Corporation

Relationships requiring disclosure include:

- immediate or wider family
- business/commercial/financial
- sexual/intimate

This is not an exhaustive list and there may be other types of personal relationships which may have the potential to cause a conflict of interest

## Register of Interest

To ensure good governance practices are upheld the College holds a register of interests in relation to all staff and their families and of any other persons with whom they have a close connection. Examples are

- all staff whose role involves the ability to commit the College to a level of expenditure
- members of certain committees
- members of staff working in key areas
- members of staff with connections with the College's other companies/sites

## Benefits

Members of staff are not permitted to receive benefits without first gaining the written permission of the Senior Management Team.

Benefits include:

- gifts (small thank you gifts from learners are acceptable)
- discounted fees on goods and/or services
- free training
- preferential treatment
- employment

## Reporting Conflicts of Interest

- If a member of staff or a learner believes there is a conflict of interests they should report this to their Head of Curriculum. If the conflict is with their Head of Curriculum then they should report this to the Assistant Principal Curriculum. If the conflict of interest is with the Assistant Principal Curriculum then they should report it to the Assistant Principal Learning and Quality.
- All discussions will be recorded and logged
- A copy of all discussions will be sent to the Assistant Principal Learning and Quality and Human Resources.

## Actions regarding a Report of Conflict of Interest

- Record details of the discussion and decisions made
- Record details of the conflict of interest but no further action is taken
- If appropriate adjusting line management structure
- If appropriate adjust decision-making powers
- If appropriate adjust budget control powers

All discussions and decisions will be recorded and filed in the Learning and Quality Office and a copy sent to HR for confidential filing.

To ensure compliance with this policy a declaration will be completed by Heads of Curriculum (counter-signed by the Assistant Principal Curriculum) on an annual basis. The declaration will confirm that there is no current or potential conflict of interest for the current academic year.

With acknowledgement to Durham University

**Declaration of Conflict of Interest**

There are no current or potential conflicts of interest within my Curriculum Area	
Head of Curriculum signature	
Date	
Director of Curriculum signature	
Date	

Name	
Curriculum Areas	
Potential conflict of interest	
Preventive actions to be taken	
Monitoring strategy	
Head of Curriculum signature	
Date	
Director of Curriculum signature	
Date	