



Conflict of Interest Policy

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 and is intended to mitigate risks and safeguard student achievements, as well as staff and College integrity and reputation.

Definitions

A conflict of interest is where an individual or organisation has competing interests or loyalties. Conflicts of interest can arise in a variety of ways and it is possible that people working for Brockenhurst College may encounter potential conflicts of interest from time to time.

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

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

Further examples include:

- Where an individual has a position of authority in one organisation which conflicts with their interests in another organisation
- Where an individual has personal interests that conflict with their professional position
- Where an individual works for Brockenhurst College but also carries out paid or unpaid work for another college or other educational establishment or awarding body

- Where an individual works for Brockenhurst College and has friends or relatives taking exams or assessments at the College.

In addition, the **Joint Council for Qualifications General Regulations** requires an examination centre, like Brockenhurst College to:

“Manage conflicts of interest by informing the awarding bodies, before the published deadline of entries for each examination series, of:

- *Any members of centre staff who are taking qualifications in their own centre which include internally assessed components/units*
- *Any members of centre of staff who are teaching and preparing members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) for qualifications which include internally assessed components/units **and***

*maintains clear records of **all instances** where:*

- *Exams office staff have members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) being entered for examinations and assessments either at the centre itself or other (out) centres;*
- *Centre staff are taking qualifications at their own centre which **do not** include internally assessed components/units;*
- *Centre staff are taking qualifications at other centres*

The Head of Centre must ensure that the records include details of the measures taken to mitigate any potential risk to the integrity of the qualifications affected. The records may be inspected by a JCQ Centre Inspector and/or awarding body staff. They might be requested in the event of concerns being reported to an awarding body. The records must be retained until the deadline for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed, whichever is later.”

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

Annual reporting of Conflicts of Interest to Meet JCQ General Regulations

- Annually a Microsoft Form: Staff Declaration of Conflict of Interest is sent to all staff.
- Staff are instructed to complete and submit the form to declare any conflicts of interest

- Essential JQC Information is included in the communication
- The Exams department collates responses and manages mitigations with oversight from the Assistant Principal Learning and Quality

Reporting Conflicts of Interest (not JCQ)

- 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 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 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) on an annual basis. The declaration will confirm that there is no current or potential conflict of interest for the current academic year.

Declaration of Conflict of Interest (Not JCQ)

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 name and signature	
Date	
Assistant Principal name and signature	
Date	