




Conflict of Interest Policy and Procedure

2025/26

Academic Year

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Department Area	Curriculum & Quality
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Next Review Date	September 2026
Status	Internal

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1. Purpose

All curriculum staff at the Sandwell Colleges will strive to avoid any conflict of interest between the organisation and the individual's work and personal, professional, and business interests which could adversely affect their judgement or objectivity. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest, which could compromise or appear to compromise their decisions.

The purpose of this policy is to protect the integrity of The Sandwell Colleges decision-making process, to enable our stakeholders and partners to have confidence in our integrity, and to protect the integrity and reputation of staff.

2. Responsibility

2.1 Overall responsibility lies with the Senior Vice Principal for Quality and Curriculum and the Executive Director for Human Resources and Organisational Development

3. Policy/Procedure

Examples of Conflict of Interest

The following are examples of situations that could lead to actual or perceived conflicts of interest where staff are involved:

- In the appointment, promotion, supervision or evaluation of a person with whom the person, has close or familial ties;
- Having a close or familial relationship with a student registered for a qualification through the College or student's family whilst being involved in decisions about the outcome of their qualification;
- Using non-public learner data for personal gain or advantage.


This is not a definitive list of examples of conflicts of interests but an indication of examples where conflict of interest or perceived conflict of interest could arise.

Staff should notify the Senior Vice Principal for Quality and Curriculum and The Executive Director for Human Resources and Organisational Development of any benefit (including hospitality) exceeding £25 in value.

Conflict of Interest Declarations Procedure

It is the responsibility of each individual working with The Sandwell Colleges to recognise situations where they have a conflict of interest or, might reasonably be seen by others to have a conflict, to disclose this conflict in order for appropriate steps to be taken. The Sandwell Colleges will raise with relevant individuals, where they identify conflict of interest or perceived conflict of interest and take appropriate action to address this.

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The Sandwell Colleges follows the process detailed below for declaring an actual or potential conflict of Interest:

- All staff are issued with a conflict of interest form to complete on commencement with the organisation;
- The form is completed even when the individual has no conflict of interest to declare;
- The information submitted is evaluated by The College in order to identify if any further action is required and a written record of the outcome of the evaluation is noted on the bottom of the form;
- Where conflict of interest is identified, this information is transferred to a register of interests' document, which stored both electronically and in hard copy;
- If the individual concerned has any changes to their declared circumstances, they must inform The College and complete an updated Conflict of Interest Form.

Conflict of Interest – Meeting Process

- During the course of meetings or activities, The College will disclose any interests in a transaction or decision where there may be a conflict between the organisations best interests and personal best interests;
- After disclosure, individuals concerned may be asked to leave the room for the discussion and may not be able to take part in the decision depending on the judgement;
- Any such disclosure and the subsequent actions taken will be noted in the minutes;

Further Action

Generally, no further action than the completion of the conflict of interest form is required.

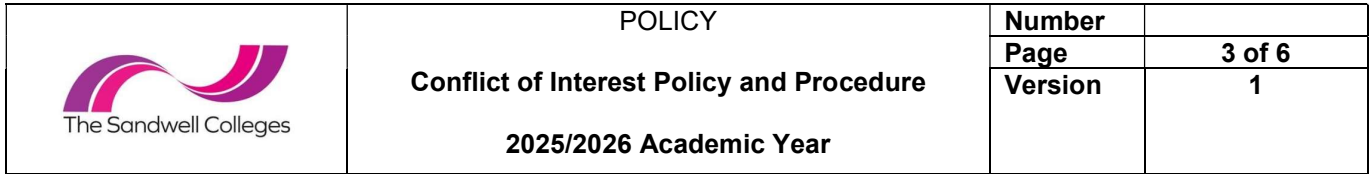
Where further action is required in line with the information disclosed, the following steps are taken in order to be managed appropriately.

- Agreed action to be taken is agreed between the individual and The College and recorded on the completed conflict of interest form.
- Examples of actions that could be taken:
 - Individual not taking part in discussions or decisions of certain matters;
 - Referring certain matters for decision to others with no vested interest;
 - Agreeing not to be involved in a particular project or with a particular centre;
 - Declaring an interest when it is appropriate to do so;
 - Referring the matter to the appropriate AWO and/or stakeholder for advice and guidance.

4. Documentation

The conflict of Interest Form is to be used were staff declare a conflict of interest or perceived conflict of interest. If a member of staff feels that there is no such conflict, then a nil return must be declared to the Quality Team as requested upon new staff induction, and then annually thereafter for existing staff

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Name	
Membership of Public Bodies	

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Signed	
Date	

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Conflict of Interest Form

GUIDANCE NOTES: AoC 1995

Any interest, financial or otherwise, which is likely or would, if publicly known, be perceived as being likely to interfere with the exercise of a (members) independent judgement should be disclosed. (Members) are in the best position to decide what business interests are relevant and should be disclosed. The interest will then be recorded in a Voluntary Register, which will be maintained by Senior Vice Principal for Quality and Curriculum and The Executive Director for Human Resources and Organisational Development. This Register enables (Members) to enclose relevant business interests in a manner which is open and transparent and demonstrates to the public that such interests have not influenced the Corporation's decision-taking process.

Procurement: A good Practice Guide FEFC and NAO 1997

12.10 Members of the College who have business relations with outside organisations should carefully consider the position in which they place themselves and the College. Where a conflict of interest is or could be perceived to be present, the person concerned should declare the fact and withdraw from the (procurement) process. Particular care should be taken not to use business information which has been gained in the course of work for personal gain, or to the advantage of relatives and friends.

12.6 Individuals and members of their family must not accept gifts or gratuities other than insignificant items such as diaries, calendars or publicity items of no commercial value. If non-acceptance would cause misunderstanding or offence to the prospective gift and the reasons for it, must be put in writing. Colleges might wish to consider issuing suppliers with a statement of their policy concerning gifts.

The policy of the College is that members of Staff should notify the Senior Vice Principal for Quality and Curriculum and The Executive Director for Human Resources and Organisational Development of any benefit (including hospitality) exceeding £25 in value.

All staff are required to complete the register, which is available during office hours to any person wishing to inspect it. A further register of those declarations which need to be made during the course of the year is maintained.

In accordance with the requirements of the Data Protection Act 2018, The Sandwell Colleges has a duty to protect the personal data it processes. To comply with this legislation, information must be collected and used fairly, stored safely and not disclosed to any person unlawfully. This is outlined in our Data Protection Policy, a copy of which can be obtained from the Data Protection Officer.

Use of personal data contained within this form will only be used for its intended purpose and in accordance with the College Data Protection Act 2018. We will not release any personal information to 3rd party organisations without obtaining your written consent

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