

<b>The Bosco Centre</b>	
<b>Policy:</b>	<b>Conflict of Interest Policy</b>
<b>Applies to:</b>	<b>College</b>
<b>Reviewed:</b>	<b>September 2024</b>
<b>Next Review:</b>	<b>September 2025</b>

### **Aim**

This Policy, based on that of the Institute of Leadership and Management, should be read in conjunction with the Bosco Centre’s own Conflict of Interest Policy. A ‘conflict of interest’ is any activity or action undertaken on behalf of the Bosco Centre and its associated Awarding Bodies, or in a private or other capacity that may impact on the reputation of the Centre and any of its associated Awarding Bodies, by a Trustee, Manager, member of staff or any associate, or any Assessor, Internal Verifier or Internal Quality Assurer used by the Bosco Centre College, which may lead the individual to act contrary to the interests of the Centre or any of its associated Awarding Bodies.

### **General principle**

A ‘conflict of interest’ is any activity or action undertaken on behalf of the Bosco Centre and its associated Awarding Bodies, or in a private or other capacity that may impact on the reputation of the Centre and any of its associated Awarding Bodies, by a Trustee, Manager, member of staff or any associate, or any Assessor, Internal Verifier or Internal Quality Assurer used by the Bosco Centre College, which may lead the individual to act contrary to the interests of the Centre or any of its associated Awarding Bodies.

### **Potential Conflict of Interest Involving the Assessment of a Learner**

The Bosco Centre will take all necessary steps to avoid a conflict of interest where any part of an Assessment of a learner (including by way of moderation) is undertaken by a person who has a personal interest in the outcome of that Assessment.

A potential conflict of interest may arise where:

- friends or relatives of the Bosco Centre’s staff or managers are enrolled as learners at the Bosco Centre College.
- friends or relatives of Assessors / Internal Verifiers / Internal Quality Assurers used by the Centre are enrolled as learners at the Bosco Centre.
- learners enrolled at the Bosco Centre are employed in any capacity.

### **Potential Conflict of Interest involving the commercial interests of the Bosco Centre**

The Bosco Centre will take all necessary steps to avoid a conflict of interest where a manager, member of staff or associate contractor or representative is connected to a party involved with the supply of a service or product to the Bosco Centre.

### **The Declaration of Interest**

The Bosco Centre requires all Trustees, managers, staff, assessors, internal verifiers and internal quality assurers, consultants and any other associates of the Bosco Centre to declare any potential conflicts of interest in connection with their work for the Bosco Centre and any of its associated Awarding Bodies. A declaration form is provided at the end of this document and will be presented at the beginning of any association with the Centre and at all staff Inductions. Those who are required to make a Declaration will be expected to do so at the beginning of each Academic year, or if their circumstances should change or new conflicts of interest arise.

### **Data Protection**

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998 and GDPR 2018 and this information will only be disclosed when the Bosco Centre is in receipt of a formal, legitimate request as defined by the Act.

### **Assessment Decisions**

Bosco Centre managers, staff, internal verifiers and internal quality assurers should not be involved in any actions or decisions in relation to a Learner's Assessment with which they have a personal interest. Any such interests should be declared at the earliest opportunity following which the Bosco Centre's managers, staff, assessor, internal verifier or internal quality assurer should withdraw from any subsequent action, decision or involvement in the Assessment process, until authorised to continue by the Principal of the Centre.

### **Senior Management Team and the Trustee Body**

Where there is a potential conflict of interest involving a member of the Senior Management Team, the Principal of the Bosco Centre will refer the matter to the Trustee Body, who will make a decision by a simple majority vote, which will exclude the member of the Senior Management Team who is the subject of the referral.

All decisions where a conflict of interest has been declared will be recorded by the Chair and reported in the minutes of the meeting set out:

- The nature and extent of the conflict of interest;
- An outline of the discussion;
- The actions taken to manage and mitigate the effects of the conflict of interest.

### **Members of Staff and Assessors, Internal Verifiers and Internal Quality Assurers**

Where there is a potential conflict of interest involving members of staff, internal verifiers and internal quality assurers, the matter should be referred to the Principal of the Bosco Centre who will ensure that appropriate actions are taken to manage and mitigate any actual conflict of interest including exclusion from further involvement in managing, monitoring, the assessment of learners and any financial transaction in any contract in which an interest has been declared.

### **Commercial Conflicts of Interest**

Where a member of staff or associate, contractor or representative is connected to a party involved with the supply of a service or product to the Bosco Centre, any potential conflict of interest should be fully disclosed to the Principal, who will ensure that appropriate actions are taken to manage and mitigate any actual conflict of interest including exclusion from further involvement in managing, monitoring and any financial transaction in any contract in which an interest has been declared.

### **Complaints and Grievances**

Bosco Centre managers, staff, assessors, internal verifiers and internal quality assurers may invoke the provisions of the Bosco Centre's Complaints and Grievance (Employees) Policy, (c.c. Pg 30 Employers' Handbook where there is a grievance regarding any decision made in accordance with the terms of this Policy.

### **Disciplinary Action**

Centre managers, staff, assessors, internal verifiers and internal quality assurers who are found to be in breach of this policy/ procedures may be subject to disciplinary action under the Bosco Centre's Disciplinary Procedure (Employees) Policy (c.c Pg 29. Employer's Handbook).