

<b>Policy number:</b>	CQ241	<b>Originator:</b>	Head of Student Experience and Quality
<b>SharePoint:</b>	Policies and Procedures:		
<b>EIA Meeting Date:</b>	10/02/2020	<b>EIA Required:</b>	YES
<b>Approved by:</b>	SLT	<b>Date:</b>	February 2020 June 2022
<b>Review Frequency:</b>	Annually		
<b>Review Date:</b>	June 2024 (Reviewed July 2020, no change, reviewed June 2022 minor changes, reviewed June 2023 no changes)		
<b>External Web Site appropriate:</b>	YES		
<b>Linked policies/College documents:</b>	Academic Misconduct and Malpractice Policy Complaints Policy Whistleblowing Policy.		
<b>Summary available:</b>	NO		

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# Conflict of Interest policy

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**This document can be made available in other formats,  
on request**

# Conflicts of Interest Policy

## Introduction

Newbury College trusts in the professionalism of the staff it employs. This Conflict of Interest policy is intended to mitigate risks and safeguard student achievements as well as staff and College integrity and reputation. It also contributes to the maintenance of awarding body accreditation and certification.

## Definition and examples of Conflict of Interest:

A conflict of interest occurs where the professional responsibilities and position of trust held by an individual or an organisation is compromised by the potential for personal gain or organisational benefit from a situation. E.g. If a member of staff is related to a student whose work they assess, there is a conflict of interest as they have a personal interest in their relative's achievement.

## Activities related to managing a conflict of interest:

- Staff are trained in managing boundaries and related conflicts as part of their induction.
- where there is potential for a conflict of interest, the awarding body will be notified, and their agreement requested prior to the start of the course.
- Any agreed conflict of interest will be recorded on a central log maintained by the examinations team.
- Development is provided for students on key policies during their induction and new policies or procedures are introduced in Tutorials.

## Disclosure:

It is important that staff and students recognise and disclose any situations that present a conflict of interest for example:

- staff applying to study or currently studying within the College where they are an employee:
- teaching, assessing, internally verifying or invigilating an exam where a relative, friend or colleague is a student.
- students completing an assessment or examination that is supervised or assessed by a member of staff who is a relative, carer or family friend.

## Failure to disclose a conflict of interest:

If a conflict of interest is identified that has not been disclosed the related examination or assessment will be invalidated and the staff or student disciplinary procedure will be activated. The qualification awarding body and the Joint Council for Qualifications (JCQ) will be notified of the conflict of interest.

## Procedure:

The Head of Department (HoD) and/or Examinations team will take steps to manage the conflict e.g.

- provide an alternative assessor, internal verifier, invigilator or support worker who is not related to any student.

- inform the awarding body if the teacher is the only available specialist in that subject area to seek their permission and to arrange for any additional scrutiny to monitor fair and impartial approaches.
- record the conflict of interest in the conflict of interest log maintained by the examinations team.
- provide details of conflicts of interest to visiting External Quality Assurers and External Examiners or others associated with the awarding body for the relevant qualification.

If a student or staff member believes that a declaration of conflict of interest has not been managed correctly they may raise a complaint in line with the Complaint's Policy. If the full complaints procedure has been exhausted and the issue remains unresolved in line with direction in the Complaints Policy, FE students may refer their concern to The Education and Skills Funding Agency. An HE student may refer the complaint to the Office of the Independent Adjudicator.

**Complaints Team, Education and Skills Funding Agency**

Cheylesmore House, Quinton Road, Coventry, CV1 2WT

**The Office of the Independent Adjudicator for Higher Education (OIA)** runs an independent scheme to review student complaints. Newbury College is a member of this scheme. If you are unhappy with the outcome you may be able to ask the OIA to review your complaint. You can find more information about making a complaint to the OIA, what it can and can't look at and what it can do to put things right here: <https://www.oiahe.org.uk/students>.

You normally need to have completed the procedure detailed in the Complaints Policy before you complain to the OIA. We will send you a letter called a "Completion of Procedures Letter" when you have reached the end of our processes and there are no further steps you can take internally. If your complaint is not upheld, Newbury College will issue you with a Completion of Procedures Letter automatically. If your complaint is upheld or partly upheld you can ask for a Completion of Procedures Letter if you want one. You can find more information about Completion of Procedures Letters and when you should expect to receive one here: <https://www.oiahe.org.uk/providers/completion-of-procedures-letters>.

Date: February 2020

Reviewed: June 2022, June 2023

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