

Conflicts of Interest Policy

Aligned with Ofsted, NCFE, SEND Code of Practice, Equality Act, and KCSIE



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Adam Smyth	V1.0	November 2024	November 2025
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CONFLICTS OF INTEREST POLICY

1. INTRODUCTION AND SCOPE

This policy applies to all individuals working for or on behalf of Hatfield Wick Education (HWE), including paid staff, volunteers, and contractors. It sets out the responsibilities and procedures for identifying, managing, and mitigating conflicts of interest to ensure transparency, ethical decision-making, safeguarding compliance, and awarding organisation integrity.

Conflicts of interest may arise when an individual's personal, financial, or professional interests conflict with their duties. HWE is committed to ensuring that such conflicts do not compromise learners, assessment integrity, safeguarding or quality of opportunity.

2. POLICY STATEMENT

HWE is committed to maintaining high standards of integrity in teaching, learning, safeguarding, governance, and assessment. Conflicts of interest will be identified, declared, recorded and managed promptly.

HWE aligns this policy with the following frameworks:

- **NCFE guidelines** for maintaining integrity in teaching, learning, and assessment.
- **Ofsted** Education Inspection Framework expectations regarding governance and integrity.
- **Department for Education** statutory guidance.
- **Equality Act 2010**, ensuring fair treatment of all stakeholders.
- **SEND Code of Practice**, considering the needs of learners with special educational needs or disabilities.
- **KCSIE**, ensuring safeguarding considerations are integral to managing conflicts of interest.

All assessment decisions must be free from bias or undue influence.

3. DEFINITIONS

- **Conflict of Interest:** A situation where personal, financial, or professional interests could compromise impartiality.
- **Perceived Conflict:** When it appears that an individual's judgment may be influenced, even if it is not.
- **Register of Interests:** A central record of declared conflicts maintained by HWE.
- **Stakeholders:** Includes learners, parents/carers, staff, contractors, and external partners.

4. EXAMPLES OF CONFLICTS OF INTEREST

Conflicts may include but are not limited to:

- A staff member assessing a learner who is a relative, close friend, or associate.
- Financial or business interests connected to suppliers or contractors.
- Delivering external training linked to qualifications delivered by HWE.
- Recruitment or disciplinary decisions involving connected individuals.
- Any situation where safeguarding or welfare decisions could be influenced by personal relationships.

5. ROLES AND RESPONSIBILITIES

All Staff and Stakeholders:

- Declare any conflicts of interest promptly to their line manager or relevant director.
- Adhere to HWE's procedures to mitigate risks arising from conflicts.
- Complete an annual declaration of interests.

Designated Safeguarding Lead (DSL):

- Ensure conflicts involving vulnerable learners are managed in line with safeguarding procedures.
- Escalate concerns where conflicts may compromise learner welfare.

Directors:

- Oversee conflict declarations and ensure appropriate action is taken to mitigate risks.
- Maintain records of conflicts and actions taken.

Operations Director:

- Conduct annual reviews of the policy and oversee training to raise awareness of conflicts of interest.

6. PROCEDURES FOR MANAGING CONFLICTS OF INTEREST

Declaration

- 6.1.1 All staff and stakeholders must declare conflicts in writing as soon as they arise.
- 6.1.2 Declarations should include the nature of the conflict, affected parties, and any relevant documentation.
- 6.1.3 Complete an annual declaration even where no conflicts exist.

Assessment and Mitigation

6.1.4 **Initial Assessment:** The line manager or director evaluates the conflict's impact and risk level.

6.1.5 **Risk Mitigation:**

- Removal from assessment, verification, recruitment, or decision-making activities.
- Increased oversight or supervision.
- Adjust responsibilities (e.g., assigning an alternate assessor or invigilator).
- Escalate significant conflicts to the Senior Leadership Team (SLT).

Conflicts relating to regulated qualifications will be managed in line with awarding organisation requirements

Documentation and Record Keeping

6.1.6 All declared conflicts are recorded in the HR Information System (HRIS).

6.1.7 Actions taken to resolve or mitigate the conflict must be documented and reviewed quarterly.

6.1.8 Records will be retained securely for a minimum of three years in line with data protection requirements

Appeals and Complaints

Where a stakeholder believes a conflict has not been managed appropriately, concerns may be raised with the CEO or escalated via the Complaints Policy.

7. RISK MANAGEMENT AND SAFEGUARDING

- **Regular Monitoring:** Conflicts are reviewed quarterly to ensure continued compliance with NCFE, Ofsted, and statutory standards.
- **Training:** Staff receive training on identifying and managing conflicts, focusing on safeguarding and equality.
- **Safeguarding Oversight:** The DSL ensures conflicts do not compromise learner welfare or safety.

Specific Scenarios

7.1.1 Additional Paid Work:

- Staff must seek written permission before engaging in additional paid or voluntary work.
- Activities that compete with or undermine HWE's operations are prohibited.

7.1.2 Assessment Materials:

- Staff with access to confidential assessment materials cannot deliver external training on the same qualifications.
- Any breaches are escalated to senior management for action.

Learner Relationships:

- Staff cannot assess or grade learners with whom they have a personal or familial relationship.
- Alternate assessors must be assigned to maintain impartiality.

8. MONITORING AND REVIEW

Annual Review:

The Operations Director reviews this policy annually, incorporating feedback from audits and stakeholder input.

Continuous Improvement:

Policy updates reflect changes in legislation, NCFE requirements, and Ofsted's Education Inspection Framework.

Data Security:

Conflict records are stored securely in compliance with GDPR.

9. COMMUNICATION

Policy Accessibility:

The policy is available on the HWE internal drive and website.

Training and Awareness:

Regular training ensures all staff understand their responsibilities under this policy.

By embedding these principles and procedures, HWE ensures conflicts of interest are managed effectively, safeguarding the integrity of its operations and the welfare of its learners.