

# Conflict of Interest Policy

## Scope and Purpose of Policy

It is the policy of Cardiff and Vale College (CAVC) that tutors and assessors must be free from conflicts of interest that could adversely affect their judgement or objectivity to the organisation in conducting business activities and assignments. CAVC recognises that tutors and assessors may take part in legitimate financial, business, charitable and other activities outside of their CAVC roles, but any potential conflict of interest raised by those activities must be acknowledged, disclosed, and in relevant cases properly managed.

It is the responsibility of each individual to recognise situations in which they have a conflict of interest, or might reasonably be seen by others to have a conflict; to disclose this conflict and to take such further steps as may be appropriate and set out in more detail under the statements below.

## Policy Statements

### Definition

A conflict of interest may generally be defined as a conflict between the official responsibilities of a tutor, assessor, and Internal Quality Assurer and any other interests the particular individual may have and as such could compromise or appear to compromise their decisions.

A conflict of interest exists where:

- CAVC's interests in any activity undertaken by it, on its behalf, or by a member of its group have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications.
- A person who is connected to the development, delivery or award of qualifications by CAVC has interests in any other activity which has the potential to lead that person to act contrary to his or her interests in that development, delivery or award.

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- An informed and reasonable observer would conclude that either of the above situations was the case.

For example:

- Tutors and assessors working with a business outside of CAVC that is in direct competition with them.
- Tutors and assessors participating in the appointment, promotion, supervision or evaluation of a person with whom the person, has close or familial ties.
- Tutors and assessors having a close or familial relationship with a CAVC registered learner, or learners' family whilst being involved in decisions about the outcome of their qualification.
- Tutors and assessors using non-public CAVC information or CAVC learner data for personal gain or advantage.
- Tutors and Assessors employed by CAVC being taught/assessed by another member of staff.

The existence of such interests as those outlined above, does not necessarily imply conflict, but is likely to give an appearance of conflict and as such should be declared.

## Disclosure

It is the duty of all tutors and assessors to disclose any actual or potential conflict of interest, and the process for doing this is documented below:

- All tutors and assessors should complete the Conflict of Interest Procedure form contained within the Conflict of Interest Procedure. This should be on appointment or when the conflict arises.
- The information held on the conflict of interest form is then transferred to a register of interests document which is maintained by a designated person at CAVC.

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- If the individual concerned has any changes to their declared circumstances, they must inform their line manager immediately in writing, so that the conflict of interest can be evaluated, and the register updated.
- The information submitted is then evaluated to identify if any further action is required and a written record of the outcome of the evaluation is kept.
- The college will remind staff of their responsibilities on an annual basis.

Most situations require no further action than the completion of the conflict of interest form. In some instances, however, the information declared on the form will require some follow up action, in order for the conflict of interest to be managed appropriately.

The approach agreed between the line manager and the tutor and assessor, will be documented and held with the conflict of interest forms.

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.

This policy shall be the subject of a three year review cycle or as necessary.

## Equality and Diversity Statement

In accordance with College procedures, this Policy was written with consideration of the impact of individuals as per the Equality Act.

## Health and Safety Implications

There are no Health and Safety implications for this policy.

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## Welsh Language Standards

This policy does not affect the Welsh language negatively. In accordance with College procedures, this Policy was written with consideration of the impact of individuals as per the Welsh Language Standards.

### Linked Policies

Not applicable

### Linked Procedures

Declaration of Conflict of Interest

### Location and Access to the Policy

This policy is available from the staff intranet and may be out of date if printed.  
There is a Welsh version of this document available.

<b>Date approved:</b> September 2013	<b>Responsible Manager:</b> Dean of Quality Improvement
<b>Approved by:</b> Quality Standards Board	<b>Executive Lead:</b> Deputy Principal Curriculum and Standards
<b>Review date:</b> September 2020	<b>Accessible to Students:</b> No

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