

1. Purpose

This policy outlines Phoenix College's approach to identifying, declaring, and managing conflicts of interest to ensure transparency, integrity, and accountability in all college activities. It supports compliance with UK legal and regulatory requirements, including guidance from the Office for Students (OfS) and the Charity Commission.

2. Scope

This policy applies to all staff, governors, contractors, volunteers, and students involved in the governance, management, delivery, or assessment of services at Phoenix College.

3. Definition of Conflict of Interest

A conflict of interest arises when an individual's personal, financial, or other interests could compromise or appear to compromise their judgment, decisions, or actions in their role at the College. Conflicts may be:

- **Actual:** A direct conflict exists.
- **Potential:** A conflict could arise in the future.
- **Perceived:** A third party might reasonably believe a conflict exists.

4. Examples of Conflicts of Interest

- Personal relationships with students or staff that may influence decision-making
- Financial interests in suppliers or contractors
- External employment or consultancy that overlaps with college responsibilities
- Involvement in assessment or recruitment processes where impartiality may be compromised

5. Responsibilities

- **All Individuals:** Must identify and declare any actual, potential, or perceived conflicts of interest.
- **Line Managers:** Must support staff in identifying and managing conflicts.
- **Quality Assurance Manager:** Maintains the Register of Interests and oversees policy implementation.
- **Governing Body:** Ensures oversight and compliance with this policy.

6. Declaration Process

- Conflicts must be declared using the College's Conflict of Interest Declaration Form.
- Declarations should be made:
 - On appointment or enrolment
 - Annually (as part of the Register of Interests)
 - As soon as a new conflict arises

7. Managing Conflicts

Once declared, conflicts will be assessed and managed through:

- Recusal from decision-making or assessment processes
- Reassignment of duties
- Enhanced oversight or monitoring
- Documentation of mitigation measures in the Register of Interests

8. Confidentiality and Data Protection

All declarations will be treated confidentially and in accordance with the College's Data Protection Policy and UK GDPR requirements.

9. Non-Compliance

Failure to declare or manage a conflict of interest may result in disciplinary action under the College's Disciplinary Policy.

10. Monitoring and Review

- The Quality Assurance Manager will review the Register of Interests annually.
- This policy will be reviewed every two years or in response to significant changes in legislation or guidance.

11. Related Policies

- Staff Code of Conduct
- Assessment Policy
- Malpractice & Maladministration Policy
- Data Protection Policy
- Disciplinary Policy

12. Contact Information

For questions or to submit a declaration, contact:

Phoenix College

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Phone: +44 (0)20 8960 3719

Review Date: September 2025

Next Review Date: October 2027