

LEARN HILLINGDON ADULT COMMUNITY EDUCATION CONFLICT OF INTEREST POLICY

Introduction and purpose

Learn Hillingdon is part of the London Borough of Hillingdon and delivers adult learning within a contract with the Education Skills Funding Agency. This policy aims to define and describe a conflict of interest and outline the roles and responsibilities of staff in managing conflicts of interest.

Definition and scope

All staff at Learn Hillingdon have loyalties and interests outside of work and conflicts of interest arise when these loyalties or interests have the potential to influence decision making and actions at Learn Hillingdon. It is important that potential conflicts of interest at Learn Hillingdon are identified and appropriately managed in order that they do not affect judgement and decision making. If not managed, conflicts of interest have the potential to adversely affect Learn Hillingdon and/or create the impression that Learn Hillingdon has acted improperly.

Each individual at Learn Hillingdon has a responsibility to declare any potential conflicts of interest. Potential conflicts of interest at Learn Hillingdon could include:

- A staff member holding a position or having an affiliation with another organisation that is in conflict with their interests at Learn Hillingdon.
- A staff member holding personal interests in conflict with their professional position at Learn Hillingdon.
- A staff member makes decisions about a learner when the learner is a friend or member of their family.

If a staff member is also a user of the service, or the carer of someone who uses the service, they should not be involved in decisions that directly affect the service that they, or the person that they care for, receive(s).

Roles and responsibilities

All staff must be aware of the potential for conflicts of interest to arise and any potential conflicts of interest must be disclosed in order that a decision can be made on an appropriate action. Where in doubt, it is important to err on the side of caution and disclose as early as possible.

Disclosures are to be made to line managers who will report them to the senior leadership team and. All potential conflicts of interest are recorded, and decisions made on conflict of interest may be as follows.

- In some cases, no action, other than disclosure and recording, will be necessary.
- In the case of decision making, staff members may need to withdraw from discussion in instances in which they have an interest in the outcome.

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- Ongoing external interests which have the potential to create a conflict of interest may need to be recorded on a register. This information will be processed in accordance with data protection principles and processed only to ensure that staff act in the best interests of the service and the council.
- In other cases, additional checks may need to be put in place. In the case of qualifications, this may be ensuring that internal verification takes place on any portfolio in which a potential conflict of interest could affect decision making.
- Where necessary, responsibilities will be delegated to others with no vested interest.
- Where unsure, any conflict of interest involving qualifications will be referred to the qualification body and the decision of the awarding body takes precedence.

Please see attached for current year risk management of staff undertaking qualification.

Current RAG rated risk management of staff currently undertaking qualifications within the service as part of their CPD (ADD YEAR HERE)

Name of staff	Position	RAG rating	Course	Mitigation
		Low		
		Medium		
		Medium		
		Low		
		Low		
		Low		
		Medium		
		Low		
		Medium		
		Low		
		Low		
		Low		
		Medium		
		Low		
		Low		
		Medium		
		Low		
		Medium		
		Medium		
		High		
		Low		
		Low		

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Name of Policy:	Conflict of Interest
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