LIMM SKILLS ACADEMY LTD
Innovation | Creativity | Empowerment

Conflicts of Interest Policy

1. Why the College has a Policy

Conflicts of interest may arise where an individual's personal or family interests and/or loyalties conflict with those of the College. These interests may be financial or emotional. Such conflicts may create problems, as they can:

- inhibit free discussion;
- result in decisions, or actions, that are not in the best interests of the College
- risk the impression that the College has acted improperly.

The aim of this policy is to protect the College and the individuals concerned from any appearance of impropriety.

2. What to do if a Conflict of Interest arises

Whenever a member of Governing Body, staff or student has a personal interest in a matter to be discussed at a meeting of the College or in a prospective commercial or financial dealing with an outside body, the individual concerned must, in the case of matters arising at meetings:

- declare an interest at or before discussion begins on the matter;
- withdraw from the meeting for that item unless expressly invited to remain in order to
- provide information; not be counted in the quorum for that part of the meeting;
- withdraw during the vote and have no vote on the matter.

In other dealings where individuals are acting on their own or in collaboration with others outside the context of a meeting, before concluding any arrangement, the matter must be discussed with an appropriate College Officer, line manager or students' representative.

It is an individuals' responsibility to raise concerns relating to conflicts of interest directly with an appropriate person within the College. If not sure what to declare, those affected should err on the side of caution and consult at the earliest possible occasion. If a conflict of interest cannot be resolved by discussion the College will set up a panel to advise the parties.

More specific advice for Fellows, staff and students is set out in the attached appendices.

3. Data Protection

Any information provided will be processed in accordance with data protection principles as set out in the GDPR AND Data Protection Act 2018. Data will be processed only to ensure that members of the Governing Body and others within the scope of this policy act in the best interests of Limm Skills Academy. The information provided will not be used for any other purpose.

Appendix 1.

1. Fellows

1. All members of the Governing Body, who are treated by statute as charity trustees, have a paramount legal obligation to act at all times with the utmost good faith and in the best interests of the College (the charity) and in accordance with its governing documents (its Statutes and by-laws) as well as ensuring that the College acts in accordance with the general law.

3. Charity Commission Guidance - The publication CC29 – Conflicts of Interest a guide for Charity Trustee – issued in May 2014 provides useful help and information. Members of Governing Body are encouraged to read the guide.

4. The Declaration of Interests - Accordingly members of Governing Body are required to declare those interests which might conflict with their duty of loyalty to the College, and also any gifts or hospitality received in connection with their role in Limm Skills Academy which might conflict with that duty. For the avoidance of doubt, this excludes the receipt of honorariums and/ or hospitality associated with giving lectures at conferences/seminars unless this creates a direct conflict with the College. The Finance Bursar should be notified promptly of the receipt of any gifts or hospitality of a value over £100 received by any member of Governing Body. A register of interests of all such gifts shall be maintained.

Appendix 2.

Limm Skills Academy Staff

Conflicts of interests can be financial and non-financial, and a potential gain can be personal or a benefit to someone with a connection to a member of staff. Commitments and obligations can also be compromised. The issue is not the integrity of the member of staff concerned, but the management of any potential to be influenced by conflicting loyalties. Even the appearance of a conflict of interest can damage reputation and so conflicts need to be managed carefully.

The following information provides guidance on the identification and subsequent management of actual, perceived or potential conflicts of interest that may be encountered by members of Limms staff.

1. Recruitment of new staff

Staff involved in the recruitment and selection process must immediately declare to the Domestic Bursar any conflict or potential conflict of interest, at which point in the interests of fairness to all candidates they will not be permitted to continue to participate. For example, it would not normally be appropriate for a member of staff to be a member of a recruitment panel where an applicant is a member of their spouse's family. Members of staff can seek confidential guidance from the HR Manager or Domestic Bursar.

2. Relationships involving a supervisor or line manager

It would normally not be appropriate for members of staff in a direct or indirect management or supervisory role to be involved in management activities relating to the member of staff with whom they have a relationship, for example:

- Authorisation of financial payments or expenses
- Salary payments
- Recruitment, selection or appointment including the provision of references
- Progression and promotion

- Probation

3. Relationships between members of staff and suppliers

Where members of staff have personal relationships with consultants, contractors or suppliers which provide goods or services to the College, and they are in a position to influence contracts or the tendering process, such personal relationships must be disclosed to the member of staff's Head of Department in good time. The Head of Department must consult the Domestic Bursar, who will take the matter to the Finance Bursar in confidence to determine whether the member of staff should take any part in determining the price or conditions associated with the contract. This duty of disclosure applies equally to any renewal or extension of contracts.

4. Private work

Members of staff may undertake private work in their own time but this must not impair the performance of the member of staff's duties nor conflict with the interests of the College. Before accepting any work or extending any existing private work members of staff are encouraged to contact their line manager. Under no circumstances shall stationery (printed or otherwise) bearing the College's name, address, letter heading or crest be used in connection with private work. Details of external consultancies, directorships, and membership of external committees must be entered onto a Register of Interests maintained by the Finance Bursar.

5. Gifts, vouchers, points or payments from suppliers

Gifts, vouchers, points or payments received personally by any member of staff from suppliers or their agents as a result of a College purchase belong to the College rather than to the person placing the order, and must be disclosed immediately to the Domestic Bursar. For the avoidance of doubt, low value items (below £10) such as calendars, diaries, pens and mugs may be retained without disclosure. In addition, members of staff should disclose to the Domestic Bursar any preferential prices or discounts offered by suppliers when purchasing goods or services on behalf of the College, as these should be announced to other staff responsible for procurement.

6. Hospitality from suppliers

Hospitality of a value over £50 received by any member of staff should be disclosed to the Domestic Bursar who will inform the Finance Bursar. The details will be entered into the Register of Interests.

7. Relationships between staff and students

The College values good professional relationships between staff and students. These relationships are heavily reliant upon mutual trust and confidence. The College does not wish to prevent, or even necessarily be aware of, liaisons between staff and students and it relies upon the integrity of both parties to ensure that abuses of power do not occur. Members of staff can seek confidential guidance from the HR Manager or Domestic Bursar.

College Disciplinary Procedures

Failure to follow the guidance set out in this policy will be considered a serious matter and may lead to disciplinary action under the College's disciplinary procedures for staff.

Appendix 3.

Students

1.The College's Conflict of Interest policy, approved by the University Council, requires that all students [and University staff] are required to recognise and disclose activities that might give rise to conflicts of interest or the perception of conflicts and to ensure that such conflicts are seen to be properly managed or avoided.

The College's 'Conflict of Interest Policy' and 'Summary of Policy and Procedures on Conflict of Interest' can be found at:

2. Limms students are also required to declare those interests which might conflict with their duty of loyalty to the College in connection with their role in Limm Skills Academy. For example, a student should disclose a conflict of interest if they are negotiating a contract for a student event in the College and the service provider is owned by a family member or a personal friend. Students can seek confidential guidance from the Domestic Bursar.