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**Conflict of Interest Policy**

Version: 1.0

**Definition and Purpose**

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 academic, financial or emotional. Such conflicts may create problems, as they can:

1. inhibit free discussion;
2. result in decisions, or actions, that are not in the best interests of the College;
3. 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.

**Scope**

MCTC Management , BTEC Management , Academic Board , Students

**Policy**

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 every conflicts in MCTC need to be managed carefully.

**Disclosure**

Staff members who hold a line management or supervisory role have an obligation to make a disclosure in all cases where they find themselves involved in:

* The recruitment, selection, or appointment of an applicant; or
* The appraisal, promotion, discipline, or other management activity of a staff member;
* The authorisation of any financial payments (e.g. timesheets, expenses claims, salary changes) for a staff member with whom they have a personal relationship, or who is known to them privately through their commercial interest, or whose known religious/ethical views or strong personal values may be perceived to be in conflict with their own.

Disclosure must be made in all cases except where there has been pre-authorisation by the Principal

**Standard Meeting procedure**

Whenever a member of the Board of Governance, 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:

1. Declare an interest at or before discussion begins on the matter;
2. Withdraw from the meeting for that item unless expressly invited to remain in order to provide information;
3. Not be counted in the quorum for that part of the meeting;
4. Withdraw during the vote and have no vote on the matter.
5. 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.

**Procedure**

1. Where a conflict of interest is discovered after consideration of a matter, the conflict must be declared to the Board and appropriately recorded at first opportunity. If the Board determines that involvement of the member in question influenced the decision of the matter, the Board shall re-examine the matter and may rescind, vary, or confirm its decision.
2. It is the responsibility of other Board members who are aware of a conflict of interest on the part of a fellow Board member to raise the issue for clarification, first with the Board member, and if unresolved, with the Board Chair.
3. If the Board member is not certain that he/she is in a conflict of interest position, the matter may be brought before the Board Chair for advice and guidance.
4. If the conflict of interest is not resolved using the above procedures, the Board member shall either remove himself/herself from the conflicting situation or step down from the Board position.

 **Penalties for Non-Disclosure of a Conflict of Interest**

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 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.

Failure to disclose an actual or potential conflict of interest could result in dismissal for gross misconduct.

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| Person Responsible | CEO , Student Service ,Programme Leader , Academic Head , Students |
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