



Conflict of Interest Policy

Ratified Date:	7 th December 2020
Signed:	
	Lynne Thornton, Chair of Governors
Review Date:	December 2021

REVIEW SHEET

The information in the table below provides details of the earlier versions of this document and brief details of reviews and, where appropriate amendments which have been made to later versions.

Version Number	Version Description	Date of Revision
1		Decemnber 2020
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1. Introduction

Cumbria Academy for Autism is required to have in place a conflict of interest policy that enables us to identify, manage and mitigate conflict of interest. All staff and other individuals have a responsibility to be aware of the potential for a conflict of interest.

2. Purpose

The purpose of this policy is to protect our integrity as a business and the integrity of our qualifications. The policy is also designed to protect our staff by providing guidance on handling possible conflicts of interest that may arise as a result of the Schools role as delivering courses. This policy:

- defines what is meant by conflict of interest
- describes the role of conflict of interest in the context of working with, or for, an awarding organisation
- sets out the responsibilities for managing conflict of interest at each level in the organisation.

3. Scope of policy

This policy applies to all staff and other individuals who interact or potentially interact with the work of the awarding organisation. This includes individuals involved with any aspects of the creation, marketing, sales, distribution, marking or any other activity connected with qualifications, tests and assessments, and supporting resources and services.

The individuals falling within the scope of this policy include all staff employed by the School on full time, part time or casual basis.

4. Definition of conflict of interest

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

Conflicts of interest can arise in a variety of circumstances for example:

- When an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation.
- When an individual has interests that conflict with his or her professional position.
- Where someone works for or carries out work on the schools behalf but may have personal interests – paid or unpaid – in another business.
- Where someone works for or carries out work on the Schools behalf, who has friends or relatives taking assessments or examinations.

5. Principles

The School will:

- Review our processes annually to ensure that all conflicts of interest or potential conflicts of interest are managed and resolved.
- Ensure that the contractual arrangements clearly set out any obligations on them to declare and manage conflicts of interest arising from other activities that they undertake.
- Ensure that anyone who has access to confidential assessment material for a qualification understands the confidential nature of the content.
- Ensure that all members of staff declare any interest for friends or family sitting examinations.

6. Responsibilities

The Governors

The ultimate responsibility for the Conflict of interest policy, dissemination of the policy and management of potential and actual conflicts of interest rests with the Governing body.

Management

Leaders in each department are responsible for communicating the Conflict of Interest Policy to all relevant individuals within their areas of responsibility annually.

Divisional/departmental responsibility of directors and their senior managers

All departments are required to review their procedures annually to ensure that they anticipate and manage potential or actual conflicts of interest.

Line managers are responsible for ensuring that all new staff receive conflict of interest information.

Any potential or actual conflict of interest must be documented by the subject leader. The SLT line manager must either resolve the issue or, for issues that cannot be resolved at this level, report the issue to the Head teacher and Governors.

All staff

Individuals within Cumbria Academy for Autism have responsibility for ensuring that they are familiar with the Conflict of Interest Policy, any guidelines and complete any required conflict of interest training.

All individuals will be required annually to read and understand the Conflict of Interest Policy.

The most important feature of the policy is the requirement that an individual disclose any activity that might give rise to a potential conflict of interest. If there is any doubt whether or not it represents a conflict of interest it should be reported.

The individual and line manager are equally responsible for ensuring that the issue is documented carefully.

An individual may wish to raise concerns relating to conflict of interest directly with the Senior Leadership team line manager. This may be done in confidence and they are entitled to receive a response to their concerns.

Any staff member considering paid or unpaid work outside of the school should inform their manager if they think there is any potential for a conflict of interest. If the staff member is unsure whether a conflict of interest might arise, they should discuss this with their line manager first. The line manager should contact the Head teacher if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A staff member must not take on any such activities that could be deemed to compete or conflict with Cumbria Academy for Autism activities.

Prior to each examination series, all staff and other individuals must inform the Head Teacher of any candidates being entered for its examinations and other assessments, who are family members, other relatives or friends.

Responsible officer: monitoring and escalation

The Head Teacher is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the business and, when necessary, to the Governors.

The Head teacher will begin an investigation of any issues identified within 48 hours. A preliminary report will be made available to the Governors within 5 working days.