



CONFLICT OF INTEREST POLICY

JANUARY 2024

Aiming to improve the quality of life skills and employability of residents in the Borough, making Wandsworth a vibrant, prosperous learning community

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Conflict of Interest Policy

1 | Mission Statement

“All Wandsworth residents will have access to a wide range of high-quality learning opportunities in a safe learning environment. Provision will be responsive, flexible and held at times and in places designed to meet the needs of learners, employers and the local community. The Lifelong Learning team aims to improve the employment skills, career development, the quality of life and wellbeing of residents in the Borough, making Wandsworth a vibrant, prosperous learning community.”

2 | Introduction

This policy and procedure set out Wandsworth Council Lifelong Learning’s approach to identifying, monitoring, and managing potential, or actual, conflicts of interest whilst ensuring compliance with regulatory requirements. Conflicts of interest can occur where an organisation or an individual has competing interests which might impair its, or their, ability to make objective, unbiased decisions within the scope of our delivered curriculum.

This policy sets out how Wandsworth Council Lifelong Learning (WCLL) identifies and monitors conflicts of interest through managing, mitigating and/or removing identified conflicts in order to maintain the integrity of its qualifications and ensure regulatory compliance.

The effective management of conflict of interest can reduce risks at both strategic and operational levels, increase awareness of potential conflicts and the associated risks, and promote strong organizational practices.

3 | Scope

All staff acting on behalf of WCLL must be free from conflicts of interest that could adversely affect their judgement or objectivity, regarding the organisation, in conducting business activities and assignments. WCLL recognises that staff may take part in legitimate financial, business, charitable and other activities outside of the centre or their role but any potential conflict of interest raised by those activities must be acknowledged, disclosed and, in relevant cases, properly managed.

It is the responsibility of each individual to recognise situations in which they have a conflict of interest or might reasonably be seen by others to have a conflict, to disclose this and to take the appropriate steps, set out in the procedure below.

4 | Purpose of the Policy

The purpose of this policy is to provide guidance to individuals on handling conflicts of interest that may arise as a result of their roles as WCLL staff, subcontractors, or employers. This policy applies to all staff and other individuals when they interact, or potentially interact, with any of WCLL's curriculum related activities.

This policy:

- defines what is meant by conflict of interest,
- sets out the roles and responsibilities for managing conflict of interest, and
- illustrates potential conflict of interest situations.

5 | Definition of Conflict of Interest

A conflict of interest is when an individual's official responsibilities clash with their interests, personal or otherwise, which could compromise, or appear to compromise, their decision-making.

Conflicts of interest can arise in a variety of circumstances in relation to organisational activity, for example:

- When an individual has a position of authority in one organisation which conflicts with his or her interests in another organisation.
- When an individual has personal interests that conflict with his or her professional position.
- Where someone is conducting assessment work on WCLL's behalf, who also has a friend or relative undertaking an assessment with WCLL.
- A person involved in the development, delivery or awarding of qualifications, who has conflicting interests that may affect their ability to fulfil their responsibilities, according to the awarding organization's conditions of recognition.

6 | Definition of Relationships

- The term "relative" means a spouse, partner, parent, parent-in-law, son, daughter, stepson, stepdaughter, child of a partner, brother, sister, grandparent, grandchild, uncle, aunt, nephew, niece, or the spouse or partner of any of the preceding persons.
- A "partner" is one member of a couple.
- A "friend" can be described as someone who is well known to you and for whom you have feelings of liking, affection and loyalty. It is a closer relationship than simply being an acquaintance. For example, if you are both members of the same charity, club or association, this is not likely, on its own, to mean that you have a friendship.
- A "close personal associate" would include a person, not employed by the Council, with whom you have a close business connection.

7 | Roles and Responsibilities

All staff undertaking assessment ('skills coaches'), moderation ('moderators' or 'verifiers') and other individuals with responsibility for these matters, must be aware of the potential for a conflict of interest. It is the individual's responsibility to declare in writing any actual or potential conflicts of interest to the Deputy Head of Lifelong Learning. The Deputy Head will then evaluate and discuss the situation and determine if a conflict of interest exists.

If it is agreed that there is a conflict of interest, then appropriate action will be taken which could involve allocating another tutor or assessor, for example.

What you are required to do:

- Declare any activity, relationship or connections that may result in a conflict of interest arising in a work capacity.
- Declare membership of any organization whose membership may conflict with being an employee of the Council. This includes any organization that may promote favouritism or special interests inconsistent with Council policy, or whose principles or beliefs give rise to a conflict of interest with the Council. Also, disclose any financial dealings you may have with any organization that you know has financial transactions with the Council.
- Other employment (outside of the Council) must be declared for staff above scale 6.
- Employees are required to act in the course of their duties in a politically neutral manner.

8 | Assessing and Managing Conflicts of Interest

The Deputy Head of Lifelong Learning will review all declared actual, potential or perceived conflicts of interest. If a potential conflict of interest is identified it will be investigated, and guidance sought from Human Resources or the relevant awarding body. All new employees must declare any potential conflicts of interest on their application form, and it is mandatory for all Wandsworth Council employees (this includes casual and full time staff) to complete the declaration form every 12 months or when there is a change in circumstance (for example, new membership of certain clubs or societies, second employment etc.). Further information can be found on the Council's intranet, The Loop: iTrent-Guidance for Employees.