

Conflict of Interest Policy

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

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Name originator/author:	Joss New - Deputy Head of Lifelong Learning
Contact details:	Joss.new@richmondandwandsworth.gov.uk T: 020 8871 7793 M: 07867 151502
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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 outline Wandsworth Council Lifelong Learning's (WCLL's) approach to identifying, monitoring, and managing actual or potential conflicts of interest while ensuring compliance with regulatory requirements. Conflicts of interest arise when an organisation or individual has competing interests that could impair their ability to make objective, unbiased decisions within the scope of our delivered curriculum.

The policy explains how WCLL identifies and manages conflicts of interest by mitigating or removing them to maintain the integrity of its qualifications and ensure regulatory compliance.

Effective conflict-of-interest management reduces risks at both strategic and operational levels, raises awareness of potential conflicts and associated risks, and promotes strong organisational practices.

3 | Scope

All staff acting on behalf of WCLL must avoid any conflicts of interest that could compromise their judgment or objectivity when carrying out business activities or assignments. WCLL recognises that staff may engage in legitimate financial, business, charitable, and other activities outside the centre or their role; however, any potential conflict arising from these activities must be acknowledged, disclosed, and, where relevant, appropriately managed.

Each individual is responsible for identifying situations where a conflict of interest exists - or could reasonably be perceived by others to exist - disclosing it, and following the steps outlined in the procedure below.

4 | Purpose of the Policy

The purpose of this policy is to provide guidance on managing conflicts of interest that may arise from roles as WCLL staff, subcontractors, or employers. It applies to all staff and individuals whenever they engage, or may engage, in any WCLL 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 occurs when an individual's official responsibilities conflict with their personal or other interests, potentially compromising—or appearing to compromise—their ability to make objective decisions.

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 has competing interests that could affect their ability to fulfil their responsibilities in accordance with the awarding organisation'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

WCLL staff and other individuals involved in assessment, moderation, or related responsibilities must be aware of the potential for conflicts of interest. Each individual is responsible for declaring in writing any actual or potential conflict of interest to the Deputy Head of Lifelong Learning. The Deputy Head will evaluate the situation, discuss it with the individual, and determine whether a conflict exists.

If a conflict of interest is confirmed, appropriate action will be taken—for example, assigning a different tutor or assessor.

Your Responsibilities

- Declare any activity, relationship or connections that may result in a conflict of interest arising in a work capacity.
- Declare any membership of organisations that may conflict with your role as a council employee. This includes organisations that promote favouritism or special interests inconsistent with council policy, or whose principles or beliefs could create a conflict of interest with the council. You must also disclose any financial dealings you have with organisations that you know engage in financial transactions with the council.
- Any employment outside the council must be declared by staff at Scale 6 or above.
- 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 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. It is mandatory for all Wandsworth Council employees (including casual and full-time staff) to complete the declaration form every 12 months or whenever there is a change in circumstances (for example, joining a new club or society, taking on second employment, etc.).

Further information can be found on the council's intranet, [The Loop: iTrent – Guidance for Employees](#).