



080. Conflict of Interest Policy

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Purpose and Scope

All International Foundation Group (IFG) staff have an obligation to act in the best interests of the company and its clients. Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of the company or the client. Such conflicts may create problems; they can:

- Inhibit free discussion;
- Result in decisions or actions that are not in the interests of IFG or its clients;
- Risk the impression that IFG has acted improperly.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

The scope of this policy is to all IFG employees, Board members and any other stakeholders to IFG.

Responsibility and Authority

This policy applies to all staff within IFG, and should be read in conjunction with the declaration of interest's form. The Quality and Compliance Director is responsible for ensuring that staff complete the declaration of interest form at the beginning of each academic year and acting in line with the findings.

The Risk, Audit and Compliance Committee receives assurance on the operation of this policy and reports to the Operations Board and Board of Governors.

Procedure

Conflict of Interest Form

Every member of staff and every Board member within IFG will receive a blank copy of the declaration of interest form on 1 August each year from the Quality and Compliance Director.

The declaration of interest form must be completed and returned by 31st August each year in readiness for the new academic year.

Any change to the declaration of interest during the academic year must be informed immediately to the Quality and Compliance Director. All interests will be recorded on IFG's register of interests, which is maintained at the IFG Head Office by the Quality and Compliance Director.

The register will be accessible to IFG senior management & the Board of Governors Members.

Declaring an Interest

If a member of staff or an assessor declares an interest, the Quality and Compliance Director must immediately draw this to the attention of the IFG Board of Governors.

If the interest is deemed to be significant and to have a direct impact upon IFG's business, the member of staff will be required to withdraw immediately from participation in any of the following activities which relate to the interest:

- Discussion of any purchase or contract.
- Decision-making on any purchase or contract.
- Management or monitoring of any contract.
- Provision of services.
- Determination of results.

Declaring a Gift/Hospitality

If a member of staff or Board member declares a gift or hospitality made on a single occasion of up to £100.00, no action will be taken other than the recording of the gift/hospitality for any future reference.

If a member of staff or Board member declares a gift or hospitality made on a single occasion, or accumulated over a number of occasions within one year, in excess of £100.00, a check will be made by the Quality and Compliance Director to see if you have any authority to influence the placing of an order or contract or to influence examination results in favour of the company or person from whom the gift/hospitality has been received.

If no such influence exists, no action will be taken other than the recording of the gift/hospitality for any future reference.

If such influence does exist, you must withdraw from any participation in any of the following activities which relate to the company or person from whom the gift/hospitality has been received:

- Discussion of any purchase or contract.
- Decision-making on any purchase or contract.
- Management or monitoring of any contract.
- Provision of services.

- Determination of results.

If any purchase, contract or provision of services has been made before the gift/hospitality was declared, an investigation must be carried out by the Quality and Compliance Director to ensure that any award was made fairly and without bias towards the company or person from whom the gift/hospitality had been received.

Where the Quality and Compliance Director declares a gift/hospitality, the above procedure will be applied by the Executive Director.

Declaring an Interest in a Student

If a staff member or Board member indicates any student who is a close relative or friend who is currently an IFG student, they will not be allowed to be part of any assessment, record keeping or awarding of that student. For example, the staff member or Board member should be excused from any academic assessment meetings or exam boards for that particular student.

What to do if you face a conflict of interest

If you are a member of staff and/or employed by IFG and are a user of IFG's services, you should not be involved in decisions that directly affect the service that you receive. You should declare your interest at the earliest opportunity and withdraw from any subsequent discussion. The same applies if you face a conflict for any other reason.

You may, however, participate in discussions from which you may indirectly benefit, for example, where the benefits are universal to all users, or where your benefit is minimal.

If you fail to declare an interest that is known to IFG Senior Management and/or the Quality and Compliance Director, they will declare that interest.

Decisions taken where a member of staff has an interest

In the event of the IFG Board of Governors having to decide upon a question in which a member of staff has an interest, all decisions will be made by vote, with a simple majority / two thirds majority required. A quorum must be present for the discussion and the decision; interested parties will not be counted when deciding whether the meeting is quorate. Interested IFG Board of Governors members may not vote on matters affecting their own interests.

All decisions under a conflict of interest will be recorded by IFG and reported in the minutes of the meeting.

The report will record:

- The nature and extent of the conflict;
- An outline of the discussion;
- The actions taken to manage the conflict.

Independent external moderation will be used where conflicts cannot be resolved through the usual procedures.

Managing contracts

If you have a conflict of interest, you must not be involved in managing or monitoring a contract in which you have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory.

Data Protection

Data will be processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Data will be processed only to ensure that all staff act in the best interests of IFG and its clients and/or suppliers. The information provided will not be used for any other purpose.

Related Policies

- IFG Staff/Student Relationship Policy
- Fit & Proper Persons
- Board of Governors Terms of Reference

Appendix A

Declaration of Interests Form

I as an employee/Board member of the International Foundation Group have set out below my interests in accordance with the International Foundation Group's Conflict of Interest Policy.

As an employee/ Board member of the International Foundation Group, you are required to act in the best interests of the International Foundation Group. However, inevitably, people have a wide range of interests in private, public and professional life and these interests might, on occasions, conflict (for example: director of supplier or consultant to charity).

We are obliged to review any possible conflicts when preparing our annual report so ask you to supply the relevant information in response to the following questions:

- Has anyone given or offered you gifts (material or financial) in your capacity as an International Foundation Group employee/Board member If so, provide details below:
- Have you, or anyone connected with you, through family, business or charity, an interest in a contract or transaction with a client? If so, provide details below.
- Have you, or any person connected with you, derived any pecuniary benefit (*gain or advantage that can be measured in monetary terms*) or gain from your role as an employee/Board member of the International Foundation Group? If so, provide details below.
- Please list below any students you are aware of who you are related to or have a relationship or friendship with.

To the best of my knowledge, the above information is complete and correct. I undertake to update, as necessary, the information provided, and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Signed: _____

Position: _____

Date: _____

Please use this space to declare any interests required by the Conflict-of-Interest Policy

