YSGOL Y LAWNT

Conflict of Interest and Declarations of Interests, Gifts and Hospitality Policy

Introduction

1.1 Ysgol y Lawnt is required to have in place a Conflict of Interest policy that enables us to identify, manage and mitigate any potential conflicts of interest. All staff and other individuals have a responsibility to be aware of the potential for a conflict of interest.

2. Purpose

2.1 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 Ysgol y Lawnt's role in delivering lessons. 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, Ysgol y Lawnt.

> sets out the responsibilities for managing conflict of interest at each level at the Ysgol y Lawnt.

3. Scope of policy

3.1 This policy applies to all staff and other individuals who interact or potentially interact with the work of Ysgol y Lawnt. This includes individuals involved with any aspects of the teaching and learning, creation, advertising, sales, distribution, marking or any other activity connected with Ysgol y Lawnt.

3.2 The individuals falling within the scope of this policy include all staff employed by Ysgol y Lawnt on a full time, part time or casual basis, the Governing body and volunteers at the school.

4. Definition of conflict of interest

4.1 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.

4.2 Conflicts of interest can arise in a variety of circumstances for example: When an individual has a position of authority in the 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 behalf of Ysgol y Lawnt but may have personal interests – paid or unpaid – in another business. Where someone works for or carries out work on Ysgol y Lawnt's behalf.

4.3The term 'Related People' is used to cover close friends or relatives. A Conflict of Interest also occurs if any member of the school's staff is employed by the school. Who are 'Related People'? 'Related People' are those with whom the member of staff has a close relationship. It would certainly include spouses, children and siblings, but would also include close friends, relatives and members of the household where there is regular contact, such that privileged information might be shared inappropriately. A step-relative, cousin, niece, etc., would count if the contact with that person was close and frequent.

4.4 **Recruitment of Family Members** – in order to safeguard employees and to eliminate collusion, a delegate of the school management team (not related to the candidate) and curriculum subcommittee will proceed with the interview process. The candidate will be assessed in accordance to the recruitment criteria.

An individual (or family members working together) should not be solely responsible for the lifespan of a transaction.

The functions listed below should be separated amongst employees. However, when this is not possible, a detailed supervisory review must take place to compensate for the lack of segregation:-

Transaction Lifespan:

- Initiate transactions
- Approve transactions
- Approve supplier selection (for procurement)
- Record transactions
- Reconcile balances
- Handle assets
- Review reports

5. Principles

5.1 Ysgol y Lawnt will: Review its 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

6.1 The Governing Body have 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.

6.2 The School Management Team are responsible for communicating the Conflict of Interest Policy to all relevant individuals within their areas of responsibility annually.

6.3 Ysgol y Lawnt are required to review their procedures annually to ensure that they anticipate and manage potential or actual conflicts of interest.

6.4 The School Management Team are responsible for ensuring that all new staff receives conflict of interest information.

6.5 Any potential or actual conflict of interest must be documented by the individual. The school management team must either resolve the issue or, for issues that cannot be resolved at this level, report the issue to the Head Teacher and Governors.

6.6 Individuals within Ysgol y Lawnt have responsibility for ensuring that they are familiar with the Conflict of Interest Policy, any guidelines and complete any required conflict of interest training.

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

6.8 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.

6.9 The individual and a member of the SMT are equally responsible for ensuring that the issue is documented carefully.

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

6.11 Any staff member considering paid or unpaid work outside of school should inform their Headteacher 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 Ysgol y Lawnt activities.

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

6.14 The Head Teacher will begin an investigation of any issues identified within 48 hours.

Gifts and Hospitality

7.1 Acceptance of Gifts and Hospitality Offers of gifts and hospitality should never be accepted in situations where acceptance would place the recipient, or the school, under an obligation to the donor, or may reasonably appear to do so, or where the purpose of the offer is to influence any judgements and decisions that the recipient might be involved in making.

7.2 Particular care should be taken over the offer of gifts or hospitality from a person or organisation that has, or is hoping to have, a contractual relationship with the school. If a member of staff or governor is in doubt about whether it is appropriate to accept any offer of gifts or hospitality the advice of the Headteacher or chair of the governing body should be sought.

7.3Staff and governors are required to register the acceptance of every single gift or item of hospitality exceeding an estimated value of £30. Gifts and Hospitality may be accepted in the following circumstances: items of low intrinsic value such as pens, calendars and diaries offered as advertising or promotional gifts; small gifts, such as flowers or boxes of chocolates, given by individuals to express gratitude for help given; attendance at sporting, social or cultural events

where it would be usual for the school to be represented and where representatives from other schools or public bodies would be invited; meals and refreshments provided at business meetings, conferences and training events; gifts which are intended for the school rather than an individual member of staff or governor may, with the agreement of the Headteacher, be accepted on behalf of the school and will then become the property of the school