

Catch22 College Policy

Conflict Of Interest Policy Catch22 College

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Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Policy Owner:	Catch22 Colleges
Queries to:	Will Duke-Oddy
Date created:	7th May 2025
Date of last review:	26 th November 2025
Date of next review:	26 th November 2026
Catch22 group, entity, hub:	Catch22 Colleges
4Policies level (all staff or managers only)	All Catch22 College Staff

Document Version Control & Changes

Version	Last modified	By	Changes Made
1.0	7th May 2025	Will Duke-Oddy - Quality & Curriculum Manager - OSH	New Policy Created
2.0			

1. What is the policy about?

The Conflict of Interest Policy ensures transparency and the avoidance of any conflicts that could compromise the integrity of Catch22 Colleges' operations, particularly in the areas of delivery, teaching, assessment, and quality assurance. This policy outlines the procedures for identifying, disclosing, and managing conflicts of interest to protect the interests of students, staff, and the organisation.

2. Who does this policy apply to?

This policy applies to all Catch22 Colleges employees, sessional staff, and anyone involved in the delivery, assessment, or quality assurance of qualifications and curriculum. It includes potential or actual conflicts of interest in relation to professional responsibilities, assessments, and external organisations.

3. Policy requirements

Definition of Conflict of Interest

A conflict of interest arises when an individual's personal, professional, or external interests could, or appear to, conflict with their responsibilities at Catch22 Colleges. This includes any situation where impartiality, objectivity, or integrity might be compromised.

Examples of Conflict of Interest

- Tutors/Teaching Assistants delivering lessons or assessments for family members or close friends.
- Internal Quality Assurers (IQA) assessing or quality assuring work by individuals they are related to or have personal relationships with.
- Invigilators overseeing exams for family members or their own students.
- Staff members working for or with a competing organisation outside of their employment at Catch22 Colleges.

This list is not exhaustive. *Please speak to your line manager if you have any questions or concerns about conflict of interest.*

Process for Declaring Conflicts of Interest

1. Form Completion
 - All staff, including new employees and sessional staff, are required to complete a Conflict-of-Interest Declaration Form at the start of employment.
 - The form must be completed annually by all staff to confirm any existing or new conflicts.

- If a new conflict arises during the year, the form must be promptly updated and submitted.

2. Form Submission

- The completed Conflict of Interest Declaration Form should be submitted to the staff member's line manager.
- Line managers are responsible for reviewing the forms and, where conflicts are disclosed, reporting these to Senior Operations Managers.

3. Evaluation of Conflicts

- Senior Operations Managers will evaluate disclosed conflicts and assess the level of risk.
- Where no risk or minimal risk is identified, no further action may be required.
- If a significant conflict is identified, appropriate steps will be taken to mitigate any risk to the integrity of the educational process.
- Where a conflict of interest has been identified actions will be recorded on the 'Conflict of Interest Declaration Form – Actions' and stored alongside the submitted form.

Actions Following Conflict Identification

- If a conflict is deemed significant, actions may include reassignment of teaching duties, reallocation of quality assurance tasks, or arranging alternative exam invigilation.
- All actions taken will prioritize the interests of students, ensuring no undue disadvantage is placed upon them.

Monitoring and Record Keeping

- A central record of all disclosed conflicts of interest will be maintained and monitored by senior management.
- These records will be retained for a minimum of 18 months and will be available for inspection by internal and external auditors.

Review and Accountability

The policy will be reviewed annually, or as necessary, to ensure its continued relevance and effectiveness. Senior Leadership Team (SLT) will work collaboratively with any external parties in the case of external conflicts of interest to find suitable solutions

4. Related policies

5. Appendices

Conflict of Interest Declaration Form

Catch22 Colleges require all staff to disclose any conflict of interest that may be present during your employment. Please read the Conflict of Interest Policy, before filling out the below form and returning to your line manager.

Your Name				
College				
Conflict of Interest Declaration				
I have a conflict of interest - <i>Please Tick/ highlight</i>	Yes		No	
<i>If yes;</i>				
What is the name of the person/ persons you have a conflict of interest with?				
In which department/ College site do they work?				
How do you know them?				
Any other comments				

Signature		Date	
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Conflict of Interest Declaration Form – Actions

For completion by Line Managers & Senior Operations Managers following a confirmed conflict of interest.

Line Manager Name			
What strategies have been put in place to minimis the risk?			
Line Manager Signature		Date	

Senior Operations Manager Name			
What strategies have been put in place to minimis the risk?			
Senior Operations Manager Signature		Date	

Annex 1: Equality Impact Assessment

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. While currently only public bodies are legally required to complete EIA's, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

1. Summary

This EIA is for:	Conflict of Interest Policy Catch22 College
EIA completed by:	Will Duke-Oddy - Quality & Curriculum Manager - OSH
Date of assessment:	07/05/2025
Assessment approved by:	<Name>, <Position> [if required]

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of the Conflict of Interest Policy Catch22 College for all staff have been fully considered and addressed, whether or not the staff members share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Summary
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy applies equally to all members of staff regardless of age. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their age.
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy applies equally to all members of staff regardless of health/disability. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their disability.
Pregnancy & Maternity/paternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	It's not considered that the policy positive or negatively impacts on pregnant women or on staff on maternity or paternity leave.
Race (incl. origin, colour and nationality)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy applies equally to all members of staff regardless of their race, origin, colour or nationality. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively in these respects.
Gender and Gender Re-assignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy applies equally to all members of staff regardless of their gender at any given time. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of gender.
Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy applies equally to all members of staff regardless of their sexual orientation. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because their sexual orientation.

3. Negative impacts and mitigations

Negative Impact	Mitigation	Owner