



# Conflict of Interest Policy

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**Version:** 1.4

Category: Policies – Probity and Ethics

Owner(s): CEO; Legal Counsel

Approved by: The Board of Governors

Access: **Public** – Anyone can view this document

Scope: This policy applies to all staff (including contractors and volunteers), students and members of the public

## 1. Purpose

- 1.1. When competing interests impair our ability to make objective, unbiased business decisions we have a conflict of interest. You may face a conflict of interest when your professional duties as a governor, member of staff or external consultant of Fairfield Business School (“FSB” or “We”) and your personal interests diverge. They may take the form of financial interests in a supplier's or customer's business, recruiting a close family member or engaging in employment outside FSB.

## 2. Scope

- 2.1. This policy applies to all members of the Board of Governors and its committees at FSB. It sets out guidelines and procedures for identifying, monitoring and managing actual and potential conflicts of interest. Any potential conflicts of interest which may arise in relation to members of staff and external consultants at FSB will be addressed by the relevant contracts of employment or engagement.

## 3. Objective

- 3.1. To communicate our requirements in respect of conflicts of interest.
- 3.2. To advise all governors, members of staff and external consultants of FSB of their obligation to disclose conflicts of interest and maintain high ethical standards.
- 3.3. To ensure that all business decisions are made in the best interests of FSB.

## 4. Associated documents

Declaration of Interest Form (Annex 1)

## 5. Principles

### **Expectations**

- 5.1. As a governor, member of staff or external consultant of FSB, you are expected to:
  - i. Maintain the highest possible standard of integrity in all your business relationships, both inside and outside the organisation in which you work.
  - ii. Reject any business practice which might reasonably be deemed improper (including improper practices which might benefit FSB).

- iii. Never use your authority or position for personal gain.
- iv. At all times, act with impartiality, independence and integrity.
- v. Avoid being, or giving the appearance of being, in a position which may result in an actual or perceived detriment to FSB's reputation and/ or interests.

### **Disclosure**

- 5.2. You must disclose or seek direction on any issues which may potentially conflict with your responsibilities to FSB.

### **Restrictions**

- 5.3. You will not be permitted to engage in transactions on behalf of FSB with organisations or individuals with which you have an interest. All decision making and transactions with the organisation concerned will be handled and managed independently.

## **6. Procedure**

### **When do I make a disclosure?**

- 6.1. It is not possible to define all situations or relationships which may create a conflict of interest, so each situation must be evaluated individually. However, some of the more obvious conflicts include:
  - i. Having any interest, dealings or shareholdings in any business which either is a competitor, customer, supplier or FSB partner or is seeking to become one.
  - ii. A close family member (including children, in-laws, partner or spouse) having any interest, dealings or shareholdings in any business which either is a competitor, customer, supplier or FSB partner, or is seeking to become one.
  - iii. Having a close or longstanding relationship/ friendship with a business which either is a competitor, customer, supplier or FSB partner, or is seeking to become one.
  - iv. In all cases, individuals have a responsibility to assess the potential conflict. Actual or perceived conflicts of interest **must** be disclosed.

### **Where do I record my disclosure?**

- 6.2. Disclosure should be made by completing the Disclosure Form (Annex 1) and you must alert your line manager or a member of the senior management. Governors, members of staff and external consultants of FSB making positive disclosures will be asked on an annual basis to review conflicts of interest.

## **Responsibilities**

- 6.3. Actual conflicts of interest must be avoided and potential conflicts of interests carefully managed. FSB must review the disclosed interest, discuss it openly and manage it so that governors, members of staff and external consultants of FSB do not become involved in or influence situations where actual conflicts of interest occur.

**Governors must also comply with FSB's Anti-Bribery Policy, which aims to prevent governors from benefiting from their position with FSB in a way which might compromise their personal judgment or integrity.**

## **7. Other employment**

- 7.1. If you wish to undertake other work while you are a governor or a member of staff of FSB then you must obtain prior written consent from your line manager or senior management.

## **8. Further advice**

- 8.1. If you are in any doubt as to whether a conflict of interest exists discuss the situation with FSB's Legal Counsel.
- 8.2. If you have any problems recording your conflict of interest please inform your line manager.

## **9. Consequences**

- 9.1. Failure to comply with the above procedures may result in disciplinary action and legal action being taken wherever appropriate.

## ANNEX 1

### DECLARATION OF INTEREST FORM

Governors are required to identify and declare their interests in line with FSB's Conflict of Interest Policy. The declaration should be completed on appointment and annually thereafter. Governors must notify FSB's Legal Counsel of any changes as they occur to ensure the Register of Interests is kept up to date.

<b>Declaration of Interests</b>		
<b>Name:</b>		
<b>Position:</b>		
	Direct interests including personal and financial interests.	Indirect Interests including interests of your spouse/ partner/ cohabitee and immediate family members which may give rise to a conflict of interest with FSB.
<b>Paid work</b> All remunerated work, including details of who you work for and in what capacity		
<b>Directorships</b> Organisation details and company registration number		
<b>Shareholdings</b> Shares in a public or private company or any other body.		
<b>Trusteeships</b> Trusteeships or management of charities and other voluntary bodies, including charity numbers.		

<p><b>Public appointments</b></p> <p>Including board committee roles.</p>		
<p><b>Political Interests</b></p> <p>All political interests</p>		
<p><b>Professional bodies</b></p> <p>Details of memberships of professional bodies and trade or other associations.</p>		
<p><b>Other interests</b></p> <p>Other interests not listed above.</p>		



## Version Tracking:

Version	Author / revisions by	Changes summary	Approved by	Date
1.0	Legal Counsel	Original version for submission to the Board of Governors	Board of Governors	Jan 2022
1.1	Wells Advisory	Amendments to document scope	Board of Governors	Jan 2022
1.2	Quality Unit Principal CEO	No major changes, review date put forward to September 2023.	Board of Governors	Sep 2022
1.3	Quality Unit Principal CEO	Minor content changes, phrasing and formatting	Board of Governors	Sep 2023
1.4	Quality Unit CEO	No major changes, policy carried over until independent review of corporate governance documents due in September 2024	Board of Governors (C.A)	Jan 2024
	-	Review date extended until September 2026	Board of Governors	Oct 2025

**Date of next review:** September 2026