



London Academy for Applied Technology (LAAT)

Conflict of Interest Policy

Policy Title	Conflict of Interest Policy
Version	2.0
Effective Date	01 May 2026
Approved by	Board of Governors / Senior Management Team / Academic Board, as applicable
Policy Owner	HR Manager / Governance Lead
Oversight Committee	Audit and Risk Committee, with academic assurance through the Quality and Standards Committee
Next Review	Every 2 years, or earlier if required by law, regulation, partnership requirements or organisational change
Scope	All employees of LAAT and relevant stakeholders involved in governance, HR, academic quality and decision-making processes
Related Documents	LAAT employment contracts; governance procedures; academic regulations; partner requirements; related People and Academic policies

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1. Purpose

This policy sets out how London Academy for Applied Technology (LAAT) identifies, declares, records and manages actual, potential and perceived conflicts of interest across its higher education provision and wider operations. It protects the integrity of LAAT decision-making, academic standards, student outcomes, procurement activity, employment decisions and partnership obligations.

The policy supports LAAT in operating transparently and in line with the expectations of a higher education provider delivering validated or franchised higher education provision. It also supports LAAT in meeting relevant regulatory, governance, legal and employment expectations, including Office for Students management and governance requirements, the UK Quality Code for Higher Education, equality duties, data protection requirements and good practice in fair employment processes.

2. Scope

This policy applies to:

Who: all LAAT employees, senior leaders, governors, committee members, academic staff, professional services staff, visiting lecturers, assessors, consultants, contractors, agency workers, external panel members and third-party representatives acting for or on behalf of LAAT. Students are covered where they sit on committees, panels or governance forums, undertake paid or representative activity for LAAT, or otherwise participate in institutional decision-making.

What: all situations where a private, personal, financial, professional, family, loyalty-based or external interest could affect, or be perceived to affect, a person's judgement, independence, objectivity or ability to act in the best interests of LAAT, its students, staff, partner university and stakeholders.

Where: all LAAT campuses, work locations, approved online, blended or hybrid delivery environments, partner delivery activity, external events, research, consultancy, recruitment, procurement, governance meetings and student-facing activity.

This policy does not apply to:

general workplace disagreements or interpersonal disputes, unless they create a conflict of interest or compromise fair decision-making;

student academic misconduct matters, except where a conflict affects the impartiality of the process or the people managing it;

personal activity that has no reasonable connection to LAAT duties, resources, students, staff, partners, suppliers, confidential information or institutional reputation.

If there is any conflict between this policy and validating university regulations, partner policies, statutory requirements or LAAT academic procedures, the stricter or more specific requirement will normally take precedence. The policy will be interpreted and updated accordingly.

3. Definitions

Conflict of interest - A situation where a person's private, personal, professional, financial or external interests could improperly influence, or appear to influence, their LAAT duties, decisions or judgement.

Actual conflict - A conflict that currently exists and directly affects a decision, duty, relationship or activity.

Potential conflict - A conflict that could arise in the future because of a known relationship, role, interest or planned activity.

Perceived conflict - A situation where a reasonable person could think that a conflict exists, even if the individual believes they can act impartially.

Conflict of loyalty - A conflict that arises because a person owes duties or has strong loyalty to another person, organisation, partner, employer, professional body, charity, supplier or external interest.

Financial interest - Any interest involving money, assets, employment, consultancy, directorships, shares, commissions, incentives, gifts, hospitality, sponsorship or other financial benefit.

Non-financial interest - Any personal, professional, academic, reputational, political, charitable, family or relationship-based interest that could affect objectivity without involving direct financial gain.

Close personal relationship - A family relationship, intimate relationship, household relationship, close friendship, business relationship or other relationship that could reasonably influence decisionmaking or create a perception of bias.

Associated person - A spouse, partner, family member, close friend, business associate or any person or organisation connected to an individual in a way that could create a conflict.

Gift or hospitality - Any item, benefit, service, event, meal, entertainment, travel, accommodation, discount, voucher, sponsorship or preferential treatment offered to or by a person because of their LAAT role.

Declaration - A formal notification of an actual, potential or perceived conflict of interest, gift, hospitality or relevant external role.

Register of Interests - A controlled record maintained by LAAT to document declarations, management actions, review dates and closure decisions.

4. Principles

Integrity and independence: LAAT decisions must be made objectively, without improper influence, favouritism or private benefit.

Student-centred and quality-led practice: Conflicts must be managed in a way that safeguards academic standards, assessment integrity, student experience, student welfare and public confidence in LAAT's higher education provision.

Transparency and early disclosure: Individuals must declare conflicts at the earliest opportunity, before taking part in any relevant decision, discussion, assessment, recruitment, procurement or governance activity.

Proportionality and risk control: Conflicts will be managed proportionately, based on the nature of the interest, the decision being made, the risk to LAAT and the perception of fairness.

Fairness, inclusion and consistency: The policy will be applied consistently and without discrimination. Declarations will be handled respectfully and will not disadvantage individuals where they are made promptly and in good faith.

Confidentiality and data protection: Declarations will be recorded securely and shared only with those who need the information to manage the risk, meet governance obligations or comply with law and regulation.

Accountability and evidence: Decisions about conflicts and the controls applied must be documented, reviewed and capable of audit.

5. Governance, Committees and Terms of Reference (Extract)

5.1 Governance and Oversight

Overall governance for conflicts of interest is provided by LAAT's Board of Governors and/or Senior Management Team, in line with LAAT's governance arrangements and relevant higher education expectations.

The Audit and Risk Committee has primary responsibility for oversight of institutional conflict of interest controls, the Register of Interests, gifts and hospitality, procurement conflicts and governance assurance.

The Quality and Standards Committee provides assurance on academic and student-related conflicts, including assessment, moderation, academic appeals, complaints, academic integrity, research ethics and partner-university requirements.

The People and Culture Committee may receive assurance on staff training, employment-related conflicts and workforce compliance themes.

Declarations of interest must be a standing agenda item at all formal committees and panels where decisions are made. Any declaration and agreed management action must be recorded in the minutes or decision record.

5.2 Oversight Committee - Terms of Reference (Policy-specific extract)

In relation to this policy, the Audit and Risk Committee, supported by the Quality and Standards Committee where academic matters are involved, will:

1. Approve and periodically review this policy and recommend any substantial changes to the relevant approving body as required.
2. Receive and consider evidence on how effectively the policy is operating, including annual declarations, register activity, gifts and hospitality trends, audit findings, incidents, breaches and improvement actions.
3. Monitor compliance with relevant regulatory, partner and legal requirements, including validating university requirements, Office for Students expectations, UK GDPR, anti-bribery obligations and employment good practice.
4. Recommend improvements to strengthen policy implementation, mitigate risks and enhance staff, student, partner and stakeholder confidence.
5. Receive an annual Conflict of Interest Report and escalate key risks through LAAT's governance structure.

Full Terms of Reference for each committee are maintained separately and should be read alongside this extract.

6. Roles and Responsibilities

Policy Owner - HR Manager / Governance Lead maintains and reviews this policy, the declaration form, the Register of Interests and related guidance;

ensures alignment with partner university requirements, regulatory expectations and legislation; provides advice on conflict management and escalates material risks to the relevant committee or senior leader; coordinates annual declarations and produces institutional reporting.

Academic Dean / Academic Quality Lead advises on academic and student-related conflicts, including assessment, moderation, external examining, academic appeals, academic misconduct, complaints, student support and research ethics;

ensures that conflict controls protect academic standards and partnership obligations;

liaises with the relevant validating university or awarding partner where a material partner-related conflict or reporting requirement arises.

Line Managers / Team Leads ensure staff are aware of and comply with this policy;

discuss possible conflicts during induction, probation, PDR and role changes;

implement agreed management controls, including removal from decision-making, reassignment of duties or restriction of system access where required; escalate unresolved or high-risk matters to the Policy Owner.

Committee Chairs / Panel Chairs request declarations at the start of meetings or before papers are considered;

decide, with advice where required, whether a conflicted person may remain, contribute, withdraw or be excluded from the decision;

ensure declarations and management actions are accurately recorded in minutes and decision records; protect quorum, independence and procedural fairness.

Finance / Procurement Lead monitors supplier-related conflicts, procurement declarations, gifts and hospitality and any commercial or financial interests;

ensures procurement panels and approval routes remain fair, transparent and auditable; escalates suspected bribery, fraud or corruption concerns through the appropriate LAAT procedure.

HR Team / People Support supports onboarding, annual declarations, training, record keeping and case management; advises on employment-related conflicts involving recruitment, promotion, pay, probation, PDR, grievance, disciplinary or welfare matters; ensures staff records are handled confidentially and in line with data protection requirements.

All staff and relevant representatives act with integrity and in LAAT's best interests;

declare actual, potential and perceived conflicts promptly, including where they are uncertain whether an interest is relevant;

cooperate with reasonable steps to manage conflicts, including withdrawal from discussions, decisions or duties;

avoid using LAAT resources, confidential information, institutional relationships or position for personal benefit.

Students / Service Users where relevant declare any conflict where they sit on LAAT committees, panels, recruitment activity, student voice forums or governance processes; follow relevant confidentiality and conduct expectations when participating in LAAT decision-making.

7. Policy Statement

7.1 Core duty to avoid and declare conflicts

All individuals covered by this policy must act honestly, objectively and in good faith when carrying out LAAT duties. They must avoid situations where their personal interests conflict with LAAT's interests and must declare any actual, potential or perceived conflict as early as possible.

A declaration must be made even where the individual believes they can remain impartial. The test is whether a reasonable person could perceive that the interest might influence the decision, process or outcome.

7.2 When declarations must be made

Declarations must be made: on appointment, engagement or joining a committee, panel or governance group; annually through the LAAT declaration cycle, including a nil return where no conflict exists; before any meeting, decision, procurement, recruitment, assessment, investigation, appeal, complaint, partnership discussion or student-related process where an interest may be relevant; within 5 working days of becoming aware of a new or changed interest, or immediately if a decision is imminent;

when accepting, declining or being offered gifts, hospitality, sponsorship or benefits that are covered by this policy;

when undertaking external employment, consultancy, directorships, trusteeships, advisory roles, research, commercial activity or public duties that may overlap with LAAT responsibilities.

Declarations must be submitted to the line manager, committee chair, HR Manager, Governance Lead or relevant academic lead, depending on the context. Where the declaration involves the line manager or chair, it must be escalated to the next appropriate senior manager or the Policy Owner.

7.3 Examples of interests that must be declared

The following examples are not exhaustive. Staff should seek advice where they are unsure.

family, intimate, close friendship, household or business relationships with students, applicants, staff, governors, suppliers, contractors, partner representatives or external examiners;

external employment, consultancy, self-employment, directorships, trusteeships, advisory roles, voluntary roles or political/public appointments that could overlap with LAAT duties; financial interests in suppliers, competitors, partner organisations, landlords, service providers, education providers or organisations seeking work with LAAT;

involvement in recruitment, promotion, pay, probation, PDR, grievance, disciplinary, dismissal or welfare decisions affecting someone with whom the person has a close personal or external relationship;

involvement in admissions, scholarships, fees, bursaries, complaints, appeals, fitness to practise, student misconduct or other student decisions affecting someone known personally to the individual; teaching, supervising, assessing, marking, moderating, invigilating, investigating or reviewing the work or case of a student where a close personal relationship, prior professional link or other conflict exists; research, knowledge exchange, consultancy, intellectual property, sponsorship or external funding that could affect independence or create commercial advantage;

gifts, hospitality, travel, accommodation, sponsorship, discounts, benefits or preferential treatment offered because of the person's LAAT role;

use of LAAT facilities, equipment, systems, data, confidential information, contacts or brand for private gain or external activity;

any circumstance that could reasonably create a perception of bias, favouritism, undue influence, improper obligation or unfair advantage.

7.4 Academic, assessment and student-related conflicts

LAAT will apply a precautionary approach to academic and student-related conflicts because of the potential impact on academic standards, student confidence, equality of opportunity and partnership assurance.

Staff must not normally teach, supervise, assess, mark, moderate, invigilate, investigate, advise, make decisions about or sit on a panel concerning a student where a close personal relationship, family relationship, business relationship, significant prior relationship or other relevant conflict exists.

Where a conflict affects assessment or moderation, the academic lead must arrange an alternative assessor, marker, moderator, panel member or reviewer wherever reasonably practicable.

Where a conflict arises in an academic appeal, complaint, misconduct, fitness to practise, mitigating circumstances, progression, award, disciplinary or safeguarding process, the conflicted person must not participate in the decision unless the relevant senior lead confirms in writing that adequate controls are in place.

Staff must declare any pre-existing close personal or intimate relationship with a student, applicant or recent former student where there is, or could reasonably be perceived to be, a power imbalance, teaching relationship, assessment role, pastoral role, supervisory responsibility or access to confidential information.

Staff must not initiate or pursue an intimate relationship with a student for whom they hold, or could reasonably be perceived to hold, teaching, assessment, supervisory, pastoral, admissions, disciplinary, welfare or professional authority.

Where a personal relationship is declared, LAAT will manage it sensitively, confidentially and transparently, normally by removing direct authority, assessment involvement, access to confidential decision-making and any avoidable power imbalance.

External examiners, visiting lecturers, assessors and partner representatives must declare any prior or current relationship with students, staff, programmes or organisations that could compromise independence.

7.5 Recruitment, employment and people decisions

Individuals must not take part in recruitment, appointment, induction sign-off, probation, performance review, pay progression, promotion, disciplinary, grievance, redundancy, restructure, wellbeing or other employment decisions where they have a conflict or close personal relationship with the person affected.

Where a conflict exists, the line manager or HR must arrange alternative decision-makers, independent panel members or additional oversight. All management actions must be documented.

7.6 Procurement, contracts, suppliers and financial decisions

Anyone involved in procurement, contract management, supplier selection, budget approval, invoice approval, partnership development or financial decision-making must declare any personal, financial, family, professional or loyalty-based interest in any supplier, bidder, contractor, subcontractor, consultant or partner organisation.

Conflicted individuals must not evaluate bids, recommend suppliers, negotiate contracts, approve expenditure, sign off invoices or access commercially sensitive information unless an agreed conflict management plan permits limited involvement for a justified reason.

Contracts must not be awarded to a connected person or organisation without transparent declaration, independent review, appropriate approvals and a clear audit trail.

Suppliers, contractors and consultants may be asked to complete conflict declarations as part of onboarding, tendering or contract management.

Suspected fraud, bribery, corruption, collusion or improper influence must be escalated immediately through LAAT's relevant governance, finance, whistleblowing or disciplinary procedures.

7.7 Gifts, hospitality, sponsorship and benefits

Gifts and hospitality must never be solicited and must not create, or appear to create, an improper obligation, inducement, conflict of interest or unfair advantage. The following controls apply unless LAAT's separate Gifts and Hospitality Policy sets stricter requirements:

Cash, vouchers, cash equivalents, personal discounts, loans or financial inducements must be declined and declared, regardless of value.

Gifts or hospitality during an active procurement, tender, assessment, admissions, investigation, appeal, complaint, disciplinary, partnership approval or contract negotiation process must be declined and declared.

Token gifts below £50 may normally be accepted if they are modest, infrequent, transparent, lawful and unrelated to an active decision. They must still be declared if there could be a perception of influence, if they are repeated, or if they relate to a supplier, student, applicant, parent, partner or regulated process.

Any gift or hospitality with an estimated value of £50 or above must be declared and approved in advance where possible. Where advance approval is not possible, it must be declared within 5 working days.

Hospitality must be reasonable, proportionate and connected to legitimate LAAT business. Lavish hospitality, overnight travel, accommodation or international travel must not be accepted without senior approval.

Any accepted gift or hospitality must be recorded in the Gifts and Hospitality Register. Declined offers may also be recorded where the offer is material, unusual, repeated, high risk or linked to a decisionmaking process.

7.8 External work, consultancy and use of LAAT resources

External employment, consultancy, directorships, trusteeships, business activity, paid speaking, professional practice, teaching for another provider or voluntary work must be declared where it may overlap with LAAT duties, create a time commitment concern, involve a competitor or partner, use LAAT resources, affect student interests or create a perception of divided loyalty.

Staff must obtain prior approval before undertaking external work that relates to LAAT business, higher education delivery, students, suppliers, partner organisations, confidential information or LAAT intellectual property.

LAAT resources, systems, data, teaching materials, student information, equipment, contacts, networks, premises or brand must not be used for private gain without written approval.

External activity must not interfere with contractual duties, working time, academic responsibilities, student support, safeguarding responsibilities or LAAT's reputation.

Where external activity is approved, LAAT may set conditions, including limits on hours, confidentiality requirements, conflict management controls, use of disclaimers or review dates.

7.9 Managing a declared conflict

Once a conflict is declared, LAAT will assess the risk and agree a proportionate management plan. Possible controls include:

recording the declaration with no further action where the risk is low and transparency is sufficient;
requiring the individual to withdraw from relevant discussions, decisions, panels, assessment activity, procurement activity or staff/student casework;
removing the individual from access to relevant documents, data, systems or confidential information;
appointing an independent decision-maker, reviewer, assessor, panel member, chair or external adviser;
reallocating teaching, supervision, marking, moderation, management, welfare or contractmanagement responsibilities;
requiring dual approval, additional oversight or a written rationale for any decision; declining or returning a gift, hospitality, benefit, sponsorship or external opportunity; pausing, revisiting or voiding a decision where the conflict was not properly managed; escalating the matter to HR, the Academic Dean, the Governance Lead, Audit and Risk Committee, Quality and Standards Committee, Senior Management Team, partner university or another relevant authority.

For governance and committee decisions, a conflicted person must normally leave the meeting for the relevant item, must not vote, and must not be counted in the quorum for that decision where the governing document or chair requires this. The minutes must record the declaration, withdrawal and decision taken.

7.10 Confidentiality, data protection and records

Declarations and conflict management records will be processed in accordance with UK GDPR, the Data Protection Act 2018 and LAAT's records management requirements. Access will be limited to those who need the information for governance, compliance, employment, academic quality, audit, legal or safeguarding purposes.

The Register of Interests will record, as appropriate, the name, role, nature of the interest, date declared, risk assessment, management action, approving manager or committee, review date and closure date. Public or wider internal disclosure will only occur where required by governance rules, law, regulation, partnership arrangements or transparency expectations.

7.11 Good faith reporting and protection from retaliation

Staff, students and representatives are encouraged to raise concerns where they believe a conflict has not been declared or managed appropriately. Concerns raised in good faith will be treated seriously and individuals must not be victimised or retaliated against for making a genuine report.

Where a person is unsure whether a matter is a conflict, they should declare it or seek advice. Declaring a conflict is normally a protective step and does not imply wrongdoing.

7.12 Breach of policy and non-compliance

Failure to declare a conflict, deliberate concealment, misuse of position, improper acceptance of gifts or hospitality, involvement in a decision despite a known conflict, or misuse of confidential information may be treated as misconduct. Serious cases may be treated as gross misconduct, fraud, bribery, corruption, breach of trust, breach of contract or a safeguarding matter, depending on the circumstances.

LAAT will manage employment-related breaches in line with the appropriate HR procedure and fair process principles. LAAT may also review, pause or set aside decisions affected by an unmanaged conflict and may notify the relevant validating university, regulator, auditor, professional body, funder or law enforcement agency where required.

8. Standard Operating Procedure (SOP) - Overview

The Standard Operating Procedure for this policy is set out in Appendix A and is supported by the declaration form, Register of Interests, Gifts and Hospitality Register, committee minute templates and conflict management plan. The SOP covers:

6. Planning / Preparation - how annual declarations, induction, committee agendas and decisionmaking processes are prepared.
7. Communication - how staff, governors, committee members, students and third parties are informed of their responsibilities.
8. Operational steps - how conflicts are declared, recorded, assessed, managed, reviewed and closed.
9. Escalation - what happens when the matter is high risk, unresolved, disputed, late or linked to academic standards, student welfare, procurement, fraud, bribery or partner obligations.
10. Record keeping - what must be recorded, where it is stored, who has access and how long records are retained.

9. Regulatory, Partner and Legal Alignment

This policy should be read alongside, and is subject to, the requirements of:

Validating university regulations, policies, partner briefings and collaborative provision requirements relating to governance, student relationships, assessment, moderation, academic appeals, complaints, academic integrity, research ethics, confidentiality and staff conduct;

Office for Students regulatory expectations, including Condition E2 on management and governance, Condition E6 on harassment and sexual misconduct where relevant, and expectations for adequate and effective governance arrangements;

the UK Quality Code for Higher Education and sector expectations for academic standards, assessment integrity and fair, evidence-based decision-making;

Committee of University Chairs Higher Education Code of Governance principles, including transparent governance, declaration of interests and management of conflicts;

Charity Commission guidance on identifying, declaring, removing and managing conflicts where trustee or charity governance duties apply;

CIPD good practice on independence, declaration, documentation and mitigation in assessment and quality assurance contexts;

Acas Code of Practice and guidance on fair workplace procedures where conflict breaches are addressed through employment processes;

NCG Gifts and Hospitality (including Conflicts of Interest) policy principles on declaration, proportionate acceptance, public perception and academic assessment-related conflicts; applicable legal and statutory duties, including the Bribery Act 2010, Fraud Act 2006, Equality Act 2010, Data Protection Act 2018, UK GDPR, safeguarding and Prevent duties, health and safety law, charity law where applicable and employment law.

If these requirements change, the policy will be reviewed and updated.

10. Monitoring, Compliance and Review

Monitoring: The Policy Owner, Governance Lead, HR Team, Finance / Procurement Lead, Academic Quality Lead and relevant committee chairs will monitor implementation through annual declarations, Register of Interests data, gifts and hospitality records, committee minutes, audit activity, procurement records, HR casework, academic quality records, complaints, appeals, assessment-related records and partner feedback.

Annual reporting: A Conflict of Interest Report will be submitted at least annually to the Audit and Risk Committee, with academic matters reported to the Quality and Standards Committee where appropriate. The report will normally include declaration completion rates, nil return rates, categories of declarations, management actions, gifts and hospitality trends, breaches, overdue reviews, training completion and improvement actions.

Non-compliance: Non-compliance will normally be addressed through management action, additional training or a formal HR, governance, procurement, academic quality, disciplinary, whistleblowing, safeguarding or partner reporting process, depending on the risk and facts of the case.

Review: This policy will be reviewed every two years, or sooner where required by changes in partner, regulatory, legal or organisational requirements. The Policy Owner is responsible for initiating the review, consulting relevant stakeholders and presenting recommended changes through the appropriate governance route.

11. Related Documents

LAAT Staff Code of Conduct / Employee Handbook

LAAT Disciplinary Policy and Procedure

LAAT Grievance Policy and Procedure

LAAT Whistleblowing / Speaking Up Policy

LAAT Conflict of Interest Policy

LAAT Anti-Bribery and Corruption Policy

LAAT Gifts and Hospitality Policy / Register

LAAT Procurement and Financial Regulations

LAAT Data Protection and Information Security policies

LAAT Safeguarding and Prevent policies

LAAT Equality, Diversity, Inclusion and Belonging Policy

LAAT Staff Induction, Probation, PDR and CPD policies

LAAT Recruitment and Selection Policy

LAAT Academic Integrity / Malpractice Policy

LAAT Assessment, Moderation and External Examiner arrangements

LAAT Student Complaints and Appeals arrangements

LAAT Personal Relationships / Professional Boundaries guidance where issued

Validating University Student Regulations Framework

Validating University Assessment Policy

Validating University Research Ethics Policy

Validating University Personal Relationships Policy

Validating University collaborative provision regulations and procedures

Relevant committee Terms of Reference and standing orders

Conflict of Interest Declaration Form and Conflict Management Plan

Appendix A - Standard Operating Procedure (SOP): Conflict of Interest - Detailed Steps

A1. Process Overview

The process moves from early identification and declaration, to recording and risk assessment, to management action, monitoring and closure. The process is designed to be practical, auditable and proportionate to risk. Individuals should declare first and seek advice if they are unsure.

A2. Step-by-Step Stages

Stage	Owner	Key action	Output / record
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Stage 1 - Identify and declare	Individual / Chair / Manager	Declare the actual, potential or perceived conflict as soon as it is identified, and before taking part in any relevant decision or activity. Use the approved declaration form, committee declaration process or urgent email route where needed.	Declaration submitted / minute record
Stage 2 - Record and acknowledge	HR / Governance Lead / Relevant Lead	Log the declaration in the Register of Interests or relevant case record. Acknowledge receipt and confirm whether interim restrictions are required before assessment.	Register entry / acknowledgement
Stage 3 - Assess risk	Policy Owner with relevant senior lead	Assess the type of interest, decision context, proximity to the matter, value, timing, risk to students, academic standards, public confidence, procurement integrity, employment fairness	Risk assessment / recommended action

Stage	Owner	Key action	Output / record
		or partner obligations.	

Stage 4 - Agree management plan	Manager / Chair / Academic Lead / Finance Lead	Decide the control measures needed. This may include withdrawal, reassignment, restricted access, independent review, additional oversight, declining a gift, or escalation.	Conflict management plan
Stage 5 - Implement and document	Relevant manager or chair	Apply the controls and document the decision in minutes, case records, procurement files, academic records or HR files as appropriate. Confirm actions to the individual.	Implemented controls / decision record
Stage 6 - Review and close	Policy Owner / Relevant Lead	Review open conflicts periodically, normally at least annually or sooner where the risk, role or relationship changes. Close the entry when the risk has ended and retain records according to the retention schedule.	Review note / closure record
Stage 7 - Escalate highrisk matters	Policy Owner / Senior Lead	Escalate where the conflict is disputed, material, linked to assessment integrity, safeguarding, harassment, procurement, fraud,	Escalation record / committee or senior decision
Stage	Owner	Key action	Output / record

		bribery, serious misconduct, governance decisionmaking or partner university assurance.	
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A3. Forms, Templates and Systems

Conflict of Interest Declaration Form

Annual Declaration / Nil Return Form

Gifts and Hospitality Declaration Form

Conflict Management Plan

Register of Interests

Gifts and Hospitality Register

Committee agenda and minutes template with declarations of interest as a standing item

HR information system / secure SharePoint / approved governance records repository

Relevant academic quality, assessment, procurement, student casework and HR records

Appendix B - Topic-Specific Guidance / Good Practice

B1. Quick Declaration Checklist

Declare the matter if you answer yes to any of the following questions:

Could I, a family member, a friend, partner, business associate or connected organisation benefit from this decision?

Could someone reasonably think my judgement might be influenced?

Do I have a current, former or planned relationship with a student, applicant, staff member, supplier, contractor, partner or external organisation involved?

Have I received or been offered a gift, hospitality, sponsorship, travel, accommodation, discount or benefit linked to my LAAT role?

Am I involved in assessment, moderation, admissions, appeals, complaints, misconduct, recruitment, procurement, finance or governance decisions affecting someone or an organisation I know?

Do I have external work, consultancy, research, directorship, trusteeship or other commitments that could overlap with LAAT duties?

Would I be comfortable if the relationship or interest appeared in a committee paper, audit file, partner review or public report?

B2. Examples and Expected Responses

Scenario	Expected response
A lecturer is asked to mark work submitted by a student who is a close family friend.	Declare immediately. Remove the lecturer from marking, moderation and related decisionmaking. Arrange an alternative marker and record the action.
A staff member sits on an interview panel where a relative has applied.	Declare before shortlisting. Remove the staff member from shortlisting, interview, scoring and appointment decisions.
A supplier offers a manager lunch during a live tender.	Decline and declare. The manager must not participate in supplier evaluation unless independent approval confirms controls are adequate.
A committee member has a directorship in an organisation discussed at the meeting.	Declare at the start of the item. The chair decides whether the member withdraws. The decision and withdrawal must be minuted.
An external examiner previously supervised a member of staff whose module they are reviewing.	Declare to the academic lead. Assess independence and either manage with controls or appoint an alternative reviewer.
A staff member undertakes consultancy for another education provider that competes with LAAT.	Declare and seek approval. Agree conditions covering time commitment, confidentiality, use of LAAT resources and any excluded activities.
A student discloses a pre-existing intimate relationship with a member of staff.	Escalate confidentially to HR and the Academic Dean. Remove any direct teaching, assessment, supervision, welfare or authority relationship and record controls.
A staff member receives repeated small gifts from the same contractor.	Declare the pattern even if individual gifts are below the threshold. Consider cumulative value and public perception. Decline future gifts if needed.

B3. Conflict Management Plan - Minimum Record

Where a conflict requires active management, the record should normally include:

- name, role and department of the person declaring the interest; date of declaration and date the interest arose;
- description of the interest and whether it is actual, potential or perceived; decision, activity, student, staff member, supplier, panel, committee or process affected; risk

assessment, including impact on academic standards, student experience, procurement integrity, employment fairness, confidentiality, safeguarding, public confidence or partner requirements; management controls agreed and who approved them;

whether the person withdrew from meetings, decisions, assessment, procurement or access to information;

review date and closure date; records where the decision and controls are documented.

B4. Conflict of Interest Declaration Form

This form may be adapted for online systems. Staff should complete all fields that are relevant.

Field	Response
Name	
Role / department	
Line manager / chair / relevant lead	
Date of declaration	
Type of declaration	Actual / Potential / Perceived / Nil return
Nature of interest	Financial / Non-financial / Personal relationship / External role / Gift or hospitality / Procurement / Academic or student-related / Other
Description of interest	
Person, organisation, student, supplier, committee or process affected	
Date interest started or became known	
Have you already taken part in any related decision or activity?	Yes / No - if yes, provide details
Immediate action taken by declarant	No action yet / Withdrew / Declined gift / Stopped activity / Sought advice / Other
Advice or approval required from	Manager / HR / Governance / Academic Quality / Finance / SMT / Partner university
Proposed management action	
Declaration by individual	I confirm that the information provided is accurate to the best of my knowledge and that I will update LAAT promptly if circumstances change.

Signature / electronic confirmation and date	
Manager / Chair / Policy Owner decision	
Field	Response
Review date	

B5. Policy Receipt and Acknowledgement

I acknowledge that I have read and understood the LAAT Conflict of Interest Policy. I understand that I am required to declare any actual, potential or perceived conflict of interest promptly and to comply with any conflict management action agreed by LAAT. I understand that failure to declare or manage a conflict may lead to action under the appropriate LAAT procedure.

Field	Response
Employee / representative name	
Role / department	
Signature / electronic confirmation	
Manager / witness if required	
Date	

B6. Reference Points Considered in Developing this Policy

Validating university and higher education sector practice: published registers of interests, personal relationships policies, research ethics policies, student regulations frameworks, governance pages and committee practice.

NCG: Gifts and Hospitality, including Declarations of Interest Policy.

CIPD: Conflict of Interest Policy for end point assessment activity and conflict management guidance.

Acas: Code of Practice and guidance on disciplinary and grievance procedures and early resolution principles.

Office for Students: Regulatory framework for higher education in England, including Condition E2 on management and governance and relevant student protection expectations.

Committee of University Chairs: Higher Education Code of Governance.

Charity Commission: Identifying and managing conflicts of interest in a charity.