



**KINGSMERE  
COLLEGE  
LONDON**

# Conflict Of Interest Policy

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## 1. Introduction

**Kingsmere College London** is committed to maintaining the highest standards of academic integrity, governance, and public confidence in the qualifications it delivers. Conflicts of interest, if not properly identified and managed, have the potential to undermine the fairness of assessment, the credibility of academic decision-making, and confidence in the College's awards.

This policy sets out a clear and proportionate framework for identifying, declaring, recording, and managing actual, potential, and perceived conflicts of interest. It is designed to protect the integrity of the College's qualifications and processes, while also protecting individuals from allegations of bias, undue influence, or malpractice.

The policy is informed by UK regulatory expectations and recognised principles of good academic governance and is reviewed annually, or sooner where required by regulatory or institutional change.

## 2. Scope of the Policy

This policy applies to all activities undertaken by, or on behalf of, **Kingsmere College London** that may influence learner outcomes, assessment decisions, certification claims, or institutional governance.

It applies to all individuals involved in the delivery, assessment, quality assurance, management, or oversight of programmes, including employees, associate lecturers, assessors, Internal Quality Assurers, senior management, contractors, consultants, and individuals acting in a governance or advisory capacity.

The policy covers conflicts that may arise in relation to:

- Teaching, assessment, internal verification, and moderation
- Learner recruitment, registration, progression, and certification
- Programme approval, review, and quality assurance
- Procurement, contracting, and appointment decisions
- Strategic, managerial, and governance level decision-making



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### **3.0 Definition of Conflict of Interest**

A conflict of interest exists where an individual's personal, professional, or financial interests could compromise, or reasonably be perceived to compromise, their impartiality or professional judgement when carrying out responsibilities on behalf of the College.

Conflicts of interest may take different forms. An actual conflict arises where competing interests are present and active. A potential conflict exists where circumstances could reasonably give rise to a conflict in the future. A perceived conflict exists where an informed observer might reasonably believe that a conflict is present, even if no improper influence exists in practice.

The College treats perceived conflicts with the same seriousness as actual conflicts, recognising that confidence in academic standards depends on both fairness and the appearance of fairness

### **4.0 Persons Who May Be Affected by a Conflict of Interest**

This policy applies to any individual who is in a position to influence, or be perceived to influence, decisions affecting learners, qualifications, assessment outcomes, or institutional operations.

Conflicts of interest must be declared where an individual, or a person with whom they have a close personal or professional relationship (such as a spouse, partner, child, relative, household member, or close friend):

- Is enrolled on, applying for, or being assessed for a qualification delivered by the College
- Is under consideration for employment, consultancy, or contractual engagement
- Has a financial or non-financial interest in an organisation that may benefit from decisions taken by the individual in their role at the College

Where there is any uncertainty as to whether a situation constitutes a conflict of interest, the interest must be declared. Failure to declare due to uncertainty is not acceptable.



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### **5.0 Declaration of Interests**

Kingsmere College London operates a mandatory and proactive declaration regime. All individuals within the scope of this policy are required to declare any actual, potential, or perceived conflicts of interest at the earliest opportunity.

Declarations are required:

- Upon appointment or engagement with the College
- When registering learners or allocating assessment responsibilities
- Whenever personal or professional circumstances change
- As part of the annual Conflict of Interest declaration process

Declarations must be made in writing using the College's approved process and are reviewed by the designated Responsible Officer. Failure to declare a conflict of interest, whether deliberate or through omission, may result in disciplinary action and may be treated as maladministration or malpractice where academic standards are affected

### **6.0 Recording, Transparency, and Data Protection**

All declared conflicts of interest are recorded in the College's Conflict of Interest Register. The register documents the nature of the conflict, the level of risk identified, the actions agreed to manage the conflict, and any review or monitoring arrangements.

Information relating to conflicts of interest is handled in accordance with data protection legislation and is used solely for the purposes of safeguarding academic integrity, governance, and regulatory compliance. Records are retained securely and are made available for internal audit, external quality assurance activity, or regulatory scrutiny where required.

### **7.0 Recognising and Escalating Conflicts of Interest**

**Kingsmere College London** recognises that conflicts of interest cannot always be anticipated in advance. Individuals are therefore expected to exercise professional judgement and remain alert to situations where a conflict may arise.

A conflict of interest may emerge at any stage of academic or operational activity, including teaching, assessment, internal verification, learner recruitment, or governance decision-making. When identified, the conflict must be declared immediately and escalated to the appropriate level of management for consideration.

Where a conflict presents a significant risk to academic standards, learner confidence, or public trust, it will be escalated to senior management and, where necessary, external bodies.



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### **8.0 Responsibilities and Accountability**

All individuals involved in the delivery, assessment, and governance of College programmes have a personal responsibility to act with integrity and impartiality, to separate personal interests from professional duties, and to declare conflicts of interest promptly and transparently.

Senior management is responsible for ensuring that this policy is applied consistently across the College, that appropriate guidance is provided, and that declared conflicts are managed effectively. Ultimate accountability for the oversight of conflict of interest arrangements rests with the College's senior governance body

### **9.0 Managing Conflicts of Interest**

All declared conflicts of interest are assessed on a case-by-case basis to determine an appropriate and proportionate management approach.

In many cases, conflicts can be effectively managed through recusal, whereby the individual withdraws from involvement in activities such as teaching, assessment, internal verification, meetings, or decision-making related to the conflict. In other cases, responsibilities may be reassigned, independent oversight introduced, or additional quality assurance measures implemented.

Where a conflict is considered fundamental and cannot be adequately mitigated, the individual may be restricted from undertaking specific activities. Failure to comply with agreed mitigation measures, including recusal requirements, may result in disciplinary action.

All decisions relating to the management of conflicts of interest are formally recorded, monitored, and reviewed.

### **10.0 Failure to Declare or Report Conflicts of Interest**

Failure to declare or report a conflict of interest, whether deliberate or through omission, will be treated as a serious breach of institutional policy. Such failures may result in disciplinary action and may be investigated as maladministration or malpractice where academic standards, assessment integrity, or learner outcomes are affected.

Where breaches are considered serious or repeated, and following a formal investigation, outcomes may include restriction or removal from specific duties, mandatory training, or termination of employment or contractual arrangements, in accordance with the centre's disciplinary procedures.

All cases will be documented, reviewed, and managed proportionately, ensuring decisions are evidence-based, fair, and aligned with the centre's quality assurance and governance frameworks.



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### **11.0 Monitoring, Review, and Continuous Improvement**

The effectiveness of this policy is monitored through annual review of the Conflict of Interest Register, internal audit and quality assurance activity, and analysis of incidents, complaints, or appeals where conflicts of interest may be relevant.

Findings from monitoring activities are used to strengthen governance arrangements, inform staff training and awareness, and continuously improve the College's approach to managing conflicts of interest.