



**“Enabling Students to Accomplish their Academic Goal”**

## **Conflict of Interest**

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## **1. Introduction**

Bellmont College maintains high standards of integrity, transparency, fairness and accountability in academic, operational, financial and governance activity. Effective identification and management of conflicts of interest protects students, staff, academic standards, public confidence and the reliability of College decision-making. *(QGP1 Belmont College Quality Handbook; QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference)*

A conflict of interest does not automatically mean that anyone has acted improperly. Conflicts can arise naturally in academic and professional settings. The key requirement is that actual, potential and perceived conflicts are disclosed early, assessed properly, recorded accurately and managed proportionately. *(QGP3 Belmont College Fit and Proper Persons Policy and Procedures)*

Bellmont College currently works with Liverpool Hope University in the delivery of higher education provision and is seeking Office for Students approval for its own funding arrangements. Under the current partnership, Belmont College provides local teaching, support and operational services while Liverpool Hope University arrangements apply to relevant awarding, academic regulation, assessment, complaints and partnership responsibilities.

Future regulatory partnership or funding developments may result in changes to Belmont College arrangements. Belmont College manages any such development transparently and with student interests protected, including continuity of study, clear information, academic standards, fair decision-making and access to appropriate support.

This policy operates alongside Belmont College governance, quality assurance and student protection arrangements, including *(QGP1 Belmont College Quality Handbook)*, and the committee responsibilities set out in *(QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference)*.

## **2. Purpose of the Policy**

The purpose of this policy is to provide a clear and practical framework for identifying, disclosing, assessing, managing, recording and reviewing conflicts of interest at Belmont College. The policy supports impartial decisions and demonstrates that decisions are made in the interests of students and Belmont College. *(QGP1 Belmont College Quality Handbook)*

The policy governs actual, potential and perceived conflicts for individuals responsible for the management and governance of Belmont College when making decisions on behalf of Belmont College. It also applies to staff, committee members, contractors, advisers and others who may influence academic, operational, student-facing, financial or governance decisions. *(QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference; HRP2 Belmont College Employee Handbook)*

The policy explains how conflicts are managed across committee work, recruitment, admissions, teaching, assessment, moderation, complaints, academic integrity,

safeguarding, procurement, finance, employment, partnership activity, public information, risk management and student support. *(RAP1 Belmont College Recruitment, Selection and Admission Policy; LTP2 Belmont College Assessment and External Examining Policy; CAP3 Belmont College Complaint and Appeal Policy and Procedure)*

### 3. Scope of the Policy

This policy applies to all members of Belmont College community and to all individuals acting for or on behalf of Belmont College, including Directors, committee members, senior leaders, employees, contractors, consultants, associate lecturers, visiting lecturers, agency workers, volunteers, student representatives, external panel members, suppliers, partners and third parties involved in College activity. *(QGP5 Belmont College Student Representative Handbook; HRP2 Belmont College Employee Handbook)*

The policy applies to all areas of institutional activity, including governance, committee decision-making, admissions, teaching and learning, assessment and moderation, external examining, academic appeals, complaints, safeguarding, student support, procurement, financial management, staffing decisions, partnership activity, public information, quality assurance, risk management, data protection and digital systems. *(BCP2 Belmont College Risk Management Policy; BCP7 Belmont College General Data Protection & Regulation (GDPR) Policy; BCP6 Belmont College Information Security and Cybersecurity Policy)*

The policy applies to current collaborative provision and to future approved provision with awarding organisations or Belmont College arrangements. Where another awarding organisation has a relevant policy, approval condition or reporting route, Belmont College works within those arrangements and records how conflicts are disclosed, managed and escalated. *(CAP1 Belmont College Student Protection Plan and Policy; BCP3 Belmont College Business Continuity Plan)*

### 4. Regulatory and Legal Framework

The following framework guides Belmont College arrangements for fair decision-making, governance, record keeping, student protection and accountability.

Requirement	Relevance to this Policy
Office for Students initial condition E7	Requires effective governance documents for registration, including arrangements for declaring and managing actual and potential conflicts of interest and mitigations for declared conflicts.
Office for Students ongoing condition E2	Requires effective management and governance for registered providers, including appropriate controls over conflicts, decision-making and governance risk.
Office for Students conditions B1, B2, B3, B4 and B5	Require high-quality academic experience, suitable resources and support, positive student outcomes, reliable assessment and secure academic standards.

Requirement	Relevance to this Policy
	Conflict management protects impartial academic judgement.
Office for Students conditions C1, C2, C3, C4 and initial C5 where applicable	Require consumer protection compliance, access to the complaints scheme, student protection arrangements and fair treatment of students.
Office for Students condition E6	Requires arrangements to address harassment and sexual misconduct. Conflict management protects impartial handling of related concerns and power imbalance risks.
Office for Students condition E8 where applicable	Supports protection against fraud and inappropriate use of public funds, including conflict controls in funding, procurement and financial decision-making.
Competition and Markets Authority expectations	Expect clear, accurate and timely information, fair terms and accessible complaint handling, all of which can be undermined by unmanaged conflicts.
UK Quality Code for Higher Education	Provides sector expectations for academic standards, quality, student engagement, partnership working, assessment and continuous enhancement.
UK GDPR and Data Protection Act 2018	Require conflict declarations, registers, minutes and case records containing personal data to be processed lawfully, fairly, securely and transparently.
Equality Act 2010	Requires fair, accessible and non-discriminatory processes, including reasonable adjustments where needed.
Bribery Act 2010	Requires proportionate controls against bribery and improper inducement, including gifts, hospitality, procurement and financial interests.
Higher Education and Research Act 2017	Provides the legal basis for the Office for Students regulatory framework in England.
Public Interest Disclosure Act 1998	Protects workers who raise qualifying public interest concerns, including serious concerns about undisclosed conflicts, fraud or governance failure.
Consumer protection legislation	Includes requirements relevant to pre-contract information, fair terms, complaints, refunds, course-change communications and student-facing decisions.
Contractual, partnership and awarding organisation obligations	Require Belmont College to comply with collaborative provision agreements and awarding organisation expectations where partnership responsibilities apply.

## 5. Definitions and Types of Conflict of Interest

A conflict of interest arises where an individual's personal, financial, professional, academic, family, social, external or organisational interests could influence, or could reasonably appear to influence, judgement, conduct or decision-making on behalf of Belmont College. *(QGP3 Belmont College Fit and Proper Persons Policy and Procedures; HRP2 Belmont College Employee Handbook)*

Conflicts may be actual, potential or perceived. An actual conflict exists where a competing interest is already affecting a decision or responsibility. A potential conflict exists where circumstances could develop into a conflict in the future. A perceived conflict exists where a reasonable observer could conclude that impartiality may be compromised, even where no improper conduct has occurred. *(QGP8 Belmont College Whistleblowing and Public Concern Policy)*

Conflicts may involve financial interests, gifts or hospitality, close personal relationships, outside employment, directorships, consultancy, professional roles, academic collaboration, recruitment or admissions decisions, assessment responsibilities, complaint or disciplinary panels, procurement processes, partnership negotiations, safeguarding matters, access to confidential information or any situation in which private interests could conflict with College interests or student interests. *(BCP5 Belmont College Anti-Bribery and Corruption Policy; BCP5.1 Belmont College Gifts and Hospitality Register)*

Type of Conflict	Example
Personal relationship conflict	A staff member is involved in admissions, assessment, support, complaints, disciplinary, safeguarding or employment decisions involving a relative, close friend, partner, former partner or person with whom they have a significant personal relationship.
Financial conflict	A director, Director, staff member or close associate has a financial interest in a supplier, landlord, recruitment agency, contractor, partner organisation or business seeking to work with Belmont College.
Academic conflict	A tutor assesses work, reviews an appeal, moderates assessment, supervises APL/APEL evidence or participates in an academic misconduct case where a personal or professional relationship could affect impartiality.
Procurement conflict	A person involved in selecting a supplier has received gifts, hospitality, consultancy income or another benefit from a bidder or potential contractor.
Governance conflict	A Board or committee member participates in a decision that could affect personal interests, an employer, a connected organisation, a supplier or a partner organisation.
Employment or recruitment conflict	A manager is involved in appointing, appraising, disciplining or supervising a relative, close associate or person with

Type of Conflict	Example
	whom they have a significant personal or business relationship.
Partnership or organisational conflict	An external role, consultancy, partnership interest or awarding organisation relationship could affect institutional decisions about provision, student protection, quality assurance or public information.

## 6. Core Principles

Bellmont College applies the following principles when managing conflicts of interest: (*QGP1 Belmont College Quality Handbook; SWP2 Belmont College Equality, Diversity and Inclusion Policy*)

- Transparency: interests are declared promptly and recorded accurately.
- Fairness: decisions are made on evidence, published criteria and relevant policy requirements.
- Student protection: student interests, academic standards and continuity of study are central to decisions.
- Proportionality: management actions are proportionate to the risk and impact of the conflict.
- Independence: individuals do not participate in decisions where impartiality could reasonably be questioned unless safeguards are approved and recorded.
- Confidentiality: personal data and sensitive information are shared only with those who need it to assess, manage, audit or report the conflict.
- Accountability: decisions, actions, recusals, safeguards and escalation routes are documented and available for audit, committee review or partner assurance where appropriate.

The principles are applied consistently while allowing reasonable adjustments, accessibility support and safe handling where a conflict matter affects a disabled student, a vulnerable student or a person requiring support to access a process. (*SWP1 Belmont College Reasonable Adjustment and Special Considerations Policy; SWP3 Belmont College Disability Policy; SWP4 Belmont College Mental Health and Wellbeing Policy*)

## 7. How this Policy Protects Students, Staff and Institutional Integrity

Conflict management supports confidence in Belmont College decisions by ensuring that academic, operational, financial and governance matters are not influenced by inappropriate personal, financial or external interests. The table below summarises expected protection routes. (*QGP4 Belmont College Student Handbook; RAP2 Belmont College Student Contract 2025-26*)

Activity	What Students and Stakeholders Can Expect	Implementation and Evidence Route
Recruitment and admissions	Applicants are selected using published criteria and consistent evidence rather than personal relationships, bias or external pressure.	Admissions records, verification checks, offer records, declaration records and committee oversight.
Teaching, assessment and feedback	Students are taught, assessed, moderated and supported by staff who are impartial and appropriately qualified. Conflicted staff are removed from decisions or safeguards are approved.	Assessment records, moderation evidence, academic integrity records, academic committee reporting and action tracking.
Complaints, appeals and conduct	Concerns are investigated and determined by individuals who are not conflicted and who can demonstrate procedural fairness.	Panel membership checks, case records, reasons for decisions, review outcomes and action logs.
Safeguarding, harassment and wellbeing	Power imbalance, vulnerability, harassment, sexual misconduct or welfare concerns are managed safely and confidentially.	Safeguarding logs, referral records, risk assessments, support plans and confidential case files.
Procurement, finance and public funds	Supplier, finance, contract, refund, compensation and payment decisions are made with segregation of duties and documented approvals.	Procurement records, gifts and hospitality records, fraud/public funds controls, finance approvals and audit evidence.
Public information and student protection	Public information is accurate and clear, and any conflict affecting material information, partnership arrangements or student protection is escalated.	Website checks, version records, risk register entries, student communications and student protection records.
Partnership and future provision	Collaborative and future own-provision arrangements are managed with clear responsibilities, external approvals, launch-readiness evidence and partner notification where required.	Partnership records, approval evidence, launch-readiness checks, action logs and committee minutes.

Where a conflict has affected, or may reasonably be perceived to have affected, a student-facing outcome, Belmont College considers whether communication, correction, support, review, appeal, complaint handling, refund, compensation or student protection action applies. *(CAP5 Belmont College Academic Appeals Policy; CAP4 Belmont College Fees, Refunds and Compensation Policy; CAP1 Belmont College Student Protection Plan and Policy)*

## 8. Higher-Risk Areas for Conflict of Interest

Conflicts may arise in any area of College activity, but the following areas require particular care because they may affect student interests, academic standards, public funds, regulatory confidence or institutional reputation: *(BCP1 Belmont College Risk Register; BCP2 Belmont College Risk Management Policy)*

- admissions decisions, interviews, entry assessments, document verification and offer-making;
- assessment setting, marking, second marking, moderation, feedback, academic misconduct, APL/APEL and mitigation decisions;
- academic appeals, complaints, student discipline, safeguarding, harassment, sexual misconduct and wellbeing casework;
- student finance, fees, refunds, compensation, hardship funds, bursaries, procurement and supplier selection;
- staff recruitment, appraisal, promotion, disciplinary, grievance, workload allocation and performance review;
- committee papers, Board decisions, risk management, regulatory submissions and public information approval;
- partnership negotiations, awarding organisation approval, launch-readiness decisions, programme changes and student protection actions;
- access to confidential personal, academic, financial, safeguarding, commercial or partnership information.

Higher-risk cases are escalated to the Head of Quality and Operations, Chief Executive Officer, relevant committee chair, Chair of the Board of Directors, Audit & Risk Committee, Academic Committee or awarding organisation route as appropriate. *(QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference)*

## 9. Disclosure, Registration and Management of Interests

All individuals covered by this policy disclose actual, potential or perceived conflicts as soon as they become aware of them. Disclosure takes place before a meeting or decision has already taken place. Where an individual is uncertain whether a matter is a conflict, they seek advice and disclose the matter for assessment. *(QGP3 Belmont College Fit and Proper Persons Policy and Procedures; HRP2 Belmont College Employee Handbook)*

Stage	What Happens
1. Identify	The individual recognises an actual, potential or perceived conflict or seeks advice if uncertain.
2. Disclose	The interest is disclosed promptly to the relevant line manager, committee chair, Head of Quality and Operations, Chief Executive Officer or Chair of the Board of Directors depending on the context.
3. Record	The declaration is recorded in the register of interests, committee minutes, case file, procurement file, assessment record or other appropriate evidence record.

Stage	What Happens
4. Assess	The relevant manager or chair assesses the risk to fairness, students, standards, finance, safeguarding, confidentiality, governance or public confidence.
5. Manage	A proportionate action is agreed. This may include recusal, independent review, second marking, alternative panel membership, segregation of duties, external advice, partner notification or prohibition of involvement.
6. Monitor	The action is monitored until the conflict is closed, controlled or escalated through the relevant committee route.

The Register of Interests is maintained or overseen by the Head of Quality and Operations, with Board-level interests are managed through the Chair of the Board of Directors or another appropriate independent route. Committee declarations are recorded in minutes. Case-specific conflicts are also recorded in the relevant case file, assessment record, admissions record, complaint file, safeguarding file, procurement record or HR record. *(QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference; BCP7 Belmont College General Data Protection & Regulation (GDPR) Policy)*

Management actions may include taking no further action where the risk is minimal and recorded; excluding the person from discussion or decision-making; reallocating responsibility; independent checking; second marking; moderation; panel substitution; partner consultation; segregation of duties; supplier exclusion; or escalation for investigation. *(LTP4 Belmont College Internal Verification Policy; LTP3 Belmont College Moderation process)*

## 9.1 Additional Requirements for Directors and Board Members

Directors and Board members have a particular responsibility to ensure that governance decisions are made transparently, independently and in the best interests of Belmont College, its students and its wider stakeholders. This includes avoiding situations where personal, financial, professional, family, business or organisational interests could influence, or reasonably appear to influence, Board or committee decisions.

All Directors and Board members complete a declaration of interests on appointment and update it at least annually. They also declare any actual, potential or perceived conflict of interest at the start of each relevant Board or committee meeting, and as soon as a conflict becomes apparent during discussion of an agenda item.

Where a Director or Board member has a declared conflict, the Chair of the Board determines the appropriate management action. This may include excluding the individual from the relevant discussion, withholding or restricting access to confidential papers, requiring the individual to leave the meeting, preventing participation in the decision, or arranging independent review or advice. The action

taken is proportionate to the nature and seriousness of the conflict and is recorded in the minutes or other appropriate governance record.

Where the conflict involves the Chair of the Board, the matter is managed by another non-conflicted Director, Deputy Chair where applicable, or another appropriate independent route. The Chair is not permitted to determine the management of their own conflict.

Directors and Board members is not permitted to use their position, access to information, or influence for personal gain or for the benefit of a connected person or organisation. This includes decisions relating to contracts, procurement, finance, staffing, partnerships, premises, regulatory submissions, student protection, academic governance or any other matter where the Director's interests may overlap with the interests of Belmont College.

Any Board-level conflict involving a financial interest, related party, supplier, partner organisation, landlord, contractor, consultant, employee, student, applicant or close personal connection is declared and recorded before the relevant matter is considered. The conflicted individual is not permitted to approve, vote on, influence or otherwise participate in the decision unless an appropriate safeguard has been agreed and documented.

The Register of Interests includes relevant Director and Board member declarations and is reviewed periodically to ensure that declarations remain current and complete. Board-level conflicts, recusals, safeguards and decisions are recorded clearly enough to demonstrate transparency, accountability and effective governance oversight.

## **10. Gifts, Hospitality, Financial Interests and Procurement**

Gifts, hospitality, donations, sponsorship, consultancy income, discounts, travel, accommodation, paid advisory roles, commission or other benefits may create an actual, potential or perceived conflict of interest. Individuals is not permitted to solicit gifts or benefits and is not permitted to accept anything that could influence, or reasonably appear to influence, a College decision. *(BCP5 Belmont College Anti-Bribery and Corruption Policy; BCP5.1 Belmont College Gifts and Hospitality Register)*

Any gift or hospitality that is more than trivial in value, repeated, linked to a procurement decision, linked to a student decision, linked to an awarding or partnership decision, or offered during a tender, contract negotiation or complaint is declared. The declaration is recorded and a management action is agreed before the individual participates in the relevant decision. *(BCP5.1 Belmont College Gifts and Hospitality Register)*

Procurement decisions are evidence-based and documented. Where a person involved in procurement has a personal, financial or professional connection to a bidder, supplier, landlord, consultant, recruitment agent or contractor, they declare the connection and are not permitted to score, approve, negotiate or influence the decision unless an independent safeguard has been approved and recorded. *(BCP4*

*Bellmont College Fraud and inappropriate use of public funds policy; BCP2 Bellmont College Risk Management Policy)*

Financial conflicts are managed in conjunction with fraud, public funds, risk management, procurement, audit and data protection arrangements. Serious concerns about bribery, fraud or misuse of public funds are escalated to the Chief Executive Officer, Audit & Risk Committee, Board of Directors or whistleblowing route as appropriate. *(BCP4 Bellmont College Fraud and inappropriate use of public funds policy; QGP8 Bellmont College Whistleblowing and Public Concern Policy)*

## **11. Academic Integrity, Admissions, Assessment and Student-Facing Decisions**

Conflicts affecting student-facing decisions are managed with particular care because they can directly affect fairness, progression, student confidence and academic standards. Relevant areas include admissions, APL/APEL, induction, student support, teaching allocation, assessment, marking, moderation, feedback, academic misconduct, mitigating circumstances, attendance intervention, complaints, appeals, disciplinary decisions and safeguarding. *(RAP1 Bellmont College Recruitment, Selection and Admission Policy; RAP4 Bellmont College Accreditation of Prior Learning Policy; LTP6 Bellmont College Academic Integrity and Misconduct Policy)*

Where a conflict affects assessment or moderation, the usual expectation is that the conflicted person does not assess, moderate, review or approve the relevant work unless no reasonable alternative exists and documented safeguards are approved. Safeguards may include blind marking, second marking, moderation, review by an academic lead, external input where appropriate or escalation through academic governance routes. *(LTP2 Bellmont College Assessment and External Examining Policy; LTP4 Bellmont College Internal Verification Policy; LTP3 Bellmont College Moderation process)*

Where a conflict affects admissions, the individual does not make or influence the offer decision, interview score, entry assessment outcome, document verification outcome or fee/funding decision unless a documented alternative process has been approved. *(RAP1 Bellmont College Recruitment, Selection and Admission Policy; RAP2 Bellmont College Student Contract 2025-26)*

Where a conflict affects complaints, appeals, conduct cases, safeguarding or harassment matters, the conflicted individual does not investigate, determine, vote on or approve the outcome. Concerns about procedural fairness are considered through the applicable complaint, appeal, safeguarding or HR procedure. *(CAP3 Bellmont College Complaint and Appeal Policy and Procedure; CAP5 Bellmont College Academic Appeals Policy; HSP1 Bellmont College Safeguarding and PREVENT Policy)*

Where attendance, retention, submissions, mitigating circumstances or special consideration are affected by a conflict, Bellmont College records the conflict and applies consistent decision-making based on evidence, published procedures and appropriate support. *(LTP9 Bellmont College Attendance, Retention and Submissions Policy; LTP8 Bellmont College Mitigating Circumstances Policy; SWP1 Bellmont College Reasonable Adjustment and Special Considerations Policy)*

## **12. Collaborative Provision and Partnership Arrangements**

Bellmont College currently works with Liverpool Hope University in the delivery of higher education provision. Collaborative provision requires clear governance, transparent decision-making and careful management of conflicts of interest across both institutions.

Where a conflict may affect Liverpool Hope University academic regulations, admissions approval, assessment oversight, external examiner confidence, academic misconduct, complaints, student protection, public information or partnership governance, Belmont College consults or notifies Liverpool Hope University in accordance with the relevant partnership framework. Students are signposted to Liverpool Hope University information where Liverpool Hope University arrangements apply, including (*LHU Liverpool Hope University Student Guide to Regulations and Policies*).

Liverpool Hope University publishes academic regulations, student policies and procedures, student contract information, student complaints arrangements and student protection information through its website. Belmont College uses that information where relevant to partnership students while retaining Belmont College local responsibilities for teaching, support, communication, safeguarding and operational delivery.

If Belmont College future funding or regulatory arrangements change, Belmont College reviews this policy, registers, committee reporting and partnership arrangements before and during any transition. The review protects student interests and ensures that changes are communicated accurately and managed without disadvantaging students.

## **13. Committee Meetings, Decision Records and Confidentiality**

Declarations of interest are a standing agenda item for relevant committees. The chair asks members to declare actual, potential or perceived conflicts at the start of the meeting and when a relevant agenda item arises. The minute records the declaration, management action and whether the individual left the meeting, remained for information only or was excluded from the decision. (*QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference*)

Decision records are clear enough to show who made the decision, what evidence was considered, how the conflict was managed, why the management action was proportionate and what follow-up was agreed. This is essential for audit, student complaints, regulatory assurance and institutional learning. (*CAP3 Belmont College Complaint and Appeal Policy and Procedure; QGP6 Belmont College Information Governance, Public Information and Transparency Policy*)

Conflict declarations and registers may contain personal, commercial, safeguarding or employment information. Access is limited to those who need the information for governance, compliance, casework, audit or legal reasons. Records are retained securely and managed in line with data protection and information security arrangements. (*BCP7 Belmont College General Data Protection & Regulation*)

*(GDPR) Policy; BCP6 Belmont College Information Security and Cybersecurity Policy; BCP8 Belmont College IT Acceptable Use Policy)*

#### **14. Non-Disclosure, Breaches, Complaints and Whistleblowing**

Failure to disclose a conflict, failure to comply with an agreed management action, misuse of confidential information, acceptance of improper benefit, interference with a fair process or deliberate concealment may constitute misconduct and may be handled under the relevant student, staff, safeguarding, academic, financial or governance route. *(HRP3 Belmont College Staff Grievance and Disciplinary Policy; LTP6 Belmont College Academic Integrity and Misconduct Policy; LTP10 Belmont College Malpractice & Maladministration Policy)*

Students or applicants who believe that a conflict of interest has affected a decision may raise the concern through the appropriate complaint or appeal route. Staff may raise concerns through line management, HR, grievance, disciplinary or whistleblowing routes depending on the nature of the concern. *(CAP3 Belmont College Complaint and Appeal Policy and Procedure; CAP5 Belmont College Academic Appeals Policy; QGP8 Belmont College Whistleblowing and Public Concern Policy)*

Serious concerns involving fraud, bribery, safeguarding, harassment, public funds, criminal conduct, regulatory reporting, institutional governance or risk to students are escalated promptly through the relevant senior, Board, audit, safeguarding or whistleblowing route. *(BCP4 Belmont College Fraud and inappropriate use of public funds policy; BCP5 Belmont College Anti-Bribery and Corruption Policy; HSP1 Belmont College Safeguarding and PREVENT Policy)*

#### **15. Equality, Accessibility, Safeguarding and Data Protection**

Bellmont College applies conflict management processes fairly and without discrimination. Decisions take account of equality, diversity, inclusion, disability, reasonable adjustments and the risk that bias or perceived bias could affect an outcome. *(SWP2 Belmont College Equality, Diversity and Inclusion Policy; SWP3 Belmont College Disability Policy; HRP4 Belmont College Equal Opportunities Policy Relating to Employment)*

Where a conflict matter involves vulnerability, wellbeing, harassment, sexual misconduct, safeguarding, prevent-related concerns or power imbalance, Belmont College prioritises safety, confidentiality, support and appropriate escalation. *(HSP1 Belmont College Safeguarding and PREVENT Policy; SWP4 Belmont College Mental Health and Wellbeing Policy)*

Conflict records are accurate, relevant, secure and proportionate. Access to registers, minutes and case records is restricted to staff or Directors with a legitimate role in management, review, audit or reporting. *(BCP7 Belmont College General Data Protection & Regulation (GDPR) Policy; BCP6 Belmont College Information Security and Cybersecurity Policy)*

Where a conflict affects health and safety, premises, events, placements, staff supervision or physical resources, Belmont College ensures that risk assessment

and decision-making are independent and recorded. *(HSP2 Belmont College Health and Safety Policy; BCP2 Belmont College Risk Management Policy)*

## 16. Governance and Committee Implementation Framework

This policy is implemented through the governance and committee structure set out below. Operational issues are managed through responsible teams and the Senior Management Committee. Academic risks are monitored through the Quality Committee, Learning and Teaching Committee and Academic Committee. Strategic, audit, finance and risk matters are escalated to the Audit & Risk Committee and Board of Directors. *(QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference; QGP1 Belmont College Quality Handbook)*

<b>Committee / Body</b>	<b>Governance and Implementation Responsibility</b>
Board of Directors	Governing body with ultimate oversight of governance effectiveness, institutional integrity, student interests, regulatory compliance, risk, financial sustainability and serious conflict matters.
Audit & Risk Committee	Advises the Board of Directors on audit, internal control, risk management, financial sustainability, regulatory compliance, fraud/public funds controls, procurement assurance and effectiveness of registers.
Academic Committee	Acts as the mandatory Board committee and academic authority for academic governance, standards, quality, assessment integrity, student outcomes and academic risk where conflicts affect academic judgement.
Senior Management Committee	Coordinates operational implementation, resourcing, cross-team action, serious conflict escalation, partnership coordination and communication, subject to Board-approved governance arrangements.
Quality Committee	Acts as a subcommittee of the Academic Committee for quality assurance, quality enhancement, student outcomes, assessment standards, academic quality risk monitoring, complaints and appeals themes and policy implementation.
Learning and Teaching Committee	Monitors learning, teaching, assessment, feedback, academic integrity and academic support matters where conflicts could affect fairness, quality or academic judgement.
Recruitment, Admissions and Registry Committee	Monitors admissions integrity, applicant decision-making, document verification, registry accuracy, student records and data handling where conflicts may affect fairness or reliability.
Student Staff Committee	Provides a student voice route for perceived conflicts, inconsistent treatment, fairness concerns, communication issues and student experience themes, with escalation through quality governance routes.
Safeguarding and PREVENT route	Manages safeguarding-related conflicts, vulnerable student risks, power imbalance concerns, harassment or misconduct

<b>Committee / Body</b>	<b>Governance and Implementation Responsibility</b>
	implications and escalation arrangements through the appropriate safeguarding route.
Equality, Diversity and Inclusion route	Supports fair, accessible and non-discriminatory conflict management, including reasonable adjustments, equality impacts and risks of bias in decision-making.

The monitoring cycle uses declarations, registers, committee minutes, admissions records, assessment records, complaints and appeals, safeguarding referrals, procurement records, HR records, student feedback, audit reports and risk register entries. Where a theme is identified, the relevant committee agrees ownership, action, timescale and reporting route. *(BCP1 Belmont College Risk Register; BCP2 Belmont College Risk Management Policy)*

## 17. Roles and Responsibilities

Clear responsibilities ensure that conflicts are disclosed, assessed, managed, recorded and reviewed consistently across Belmont College. *(QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference; HRP2 Belmont College Employee Handbook)*

<b>Role</b>	<b>Responsibility</b>
Board of Directors	Governing body with overall authority for Belmont College's business. Approves this policy, oversees governance effectiveness, declares and manages Board-level interests, reviews register assurance and ensures that student interests, academic standards, regulatory compliance and institutional integrity are protected.
Chair of the Board of Directors	Receives and manages conflicts involving the Chief Executive Officer, Directors or other senior governance matters, and ensures appropriate recusal, independent oversight or escalation.
Chief Executive Officer	Holds executive accountability for implementing Board-approved strategy, policy implementation, institutional integrity, escalation of serious conflicts, partnership coordination, operational resourcing and regulatory compliance.
Head of Quality and Operations	Leads oversight of the quality assurance framework, owns this policy, maintains or oversees the register of interests, advises committees, supports conflict management plans, coordinates monitoring and reports themes through the Senior Management Committee, Quality Committee and Academic Committee routes.
Head of Academic Programmes	Provides academic leadership for programme quality and standards and ensures conflicts are managed in

Role	Responsibility
	teaching, assessment, moderation, APL/APEL, academic support, academic misconduct, appeals and academic decision-making.
Head of Professional Services	Oversees professional services across the student lifecycle and ensures conflicts are managed in recruitment, admissions, registry, student support, finance-related communications, applicant engagement and professional services decision-making.
Head of IT and Human Resources	Ensures staff recruitment, staff development, fair employment practice, HR records, appraisal, disciplinary and grievance matters, secure systems access and confidential information handling are managed with appropriate conflict controls.
Committee Chairs	Request declarations, decide how declared conflicts are managed in meetings, ensure minutes record actions, and escalate significant concerns through the appropriate governance route.
Line Managers	Support staff in identifying and declaring conflicts, review management actions and adjust responsibilities where required.
Finance and Procurement Staff	Ensure procurement and financial processes include declaration checks, segregation of duties and documented decisions.
Admissions, Registry and Student Support Staff	Declare conflicts involving applicants or students, maintain accurate records and ensure decisions are fair and evidence-based.
Academic Staff and Tutors	Declare conflicts affecting students, assessments, feedback, academic misconduct, appeals, supervision or support and comply with management actions.
Student Representatives	Declare conflicts where they are involved in committees, feedback routes, recruitment activity, events, panels or other representative responsibilities.
All Staff and Persons Acting for Belmont College	Act with integrity, disclose conflicts promptly, cooperate with management actions and protect confidential information.

Human resources, appraisal, training and employment processes are managed so that recruitment, development, performance review, grievance and disciplinary decisions are free from inappropriate influence. *(HRP1 Belmont College Staff Development Plan; HRP5 Belmont College Appraisal Guide For Employees; HRP3 Belmont College Staff Grievance and Disciplinary Policy)*

## 18. Training, Monitoring, Audit and Evidence

Bellmont College provides induction, staff development, committee guidance and periodic reminders so that individuals understand how to identify, declare and manage conflicts. Staff involved in assessment, admissions, complaints, safeguarding, procurement, finance, HR and committee work receive role-relevant guidance. (*HRP1 Belmont College Staff Development Plan; QGP1 Belmont College Quality Handbook*)

<b>Activity</b>	<b>What Belmont College Does</b>
Induction and annual update	Staff, committee members and relevant representatives receive information about conflict identification, disclosure, registers, meeting declarations and escalation routes.
Committee assurance	Committees include declarations as a standing item and record any recusal, management action or escalation.
Register review	The register of interests and related records are reviewed periodically to identify themes, gaps, overdue declarations or unmanaged risks.
Casework and assessment audit	Admissions, assessment, appeals, complaints, safeguarding, HR and procurement casework may be sampled to test whether conflicts were identified and managed.
Annual policy review	The policy is reviewed at least annually, or sooner following regulatory change, serious incident, audit finding, partnership change or governance change.

Monitoring includes periodic review of the register of interests, sampling of committee minutes, review of casework, analysis of complaints and appeals, review of procurement and finance evidence, and reporting of material themes through the relevant governance route. (*BCP2 Belmont College Risk Management Policy; CAP2 Belmont College Consumer Protection Policy and Implementation Framework*)

Where conflict management identifies weakness in public information, academic delivery, assessment, student support, safeguarding, finance, HR, IT systems or student protection, an action plan is recorded and monitored until closed. (*QGP6 Belmont College Information Governance, Public Information and Transparency Policy; CAP1 Belmont College Student Protection Plan and Policy*)

## 19. Conclusion

Bellmont College manages conflicts of interest in a transparent, evidence-based and proportionate way. Belmont College expects all individuals acting for or on behalf of Belmont College to disclose interests promptly, comply with management actions and protect students, academic standards, public confidence and institutional integrity. (*QGP1 Belmont College Quality Handbook; QGP8 Belmont College Whistleblowing and Public Concern Policy*)

This policy supports current collaborative provision and future approved provision by ensuring that decisions about students, staff, quality, finance, procurement,

governance, public information, safeguarding and partnerships are impartial, recorded and subject to appropriate oversight. (*QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference; BCP2 Belmont College Risk Management Policy*)

<b>Bellmont College Conflict of Interest Policy</b>					
<b>Version</b>	<b>Date</b>	<b>Author(s)</b>	<b>Amendments</b>	<b>Approved by</b>	<b>Next review</b>
1	March 2023	Head of Quality and Operations	New Document	Board of Governors	February 2024
2	February 2024	Head of Quality and Operations	Revised - no updates or changes made	Board of Governors	October 2024
3	October 2024	Head of Quality and Operations	Revised Document	Board of Governors	October 2025
4	March 2026	Head of Quality and Operations	Revised Document	Board of Directors	March 2027