

The background features a large, stylized 'TEC' logo. The 'T' is blue with a white outline, the 'E' is light blue with a white outline, and the 'C' is purple with a white outline. There are also faint, light blue outlines of the 'TEC' logo scattered across the page.

Conflict of Interest Policy

2021

Change Control

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Version	Type	Date	History
V1.0	New	April 2014	New
V1.1	Revision	May 2017	Replacement
V2	Revision	04/09/2015	Amendments
V3	Revision	October 2021	Amendments to reflect ERC merger and change of institution's name to TEC Partnership

This policy applies to Grimsby Institute of Further & Higher Education (GIFHE) and incorporates the trading styles of TEC Partnership, Grimsby Institute of Further and Higher Education, Scarborough TEC, Skegness TEC, The Academy Grimsby and all wholly owned subsidiary companies of the Grimsby Institute of Further & Higher Education which include Modal, Support Staff Services and Grimsby College Trading.

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1. Background

1.1 It is the policy of the TEC Partnership Corporation (“the Corporation”) that all members of the Corporation (including co-opted members) and senior staff attending Corporation and/or corporation committee / local board meetings; must keep to the absolute minimum all unavoidable conflicts of interest between the interests of the Corporation and the personal, professional and business interests of members or senior staff members concerned, and of persons connected with them. This includes avoiding as far as possible perceptions of conflicts of interest, as well as potential and actual conflicts of interest.

1.2 The purpose of this policy is to:

- protect the integrity of the Corporation's decision-making process;
- enable all outside parties dealing with the Corporation to have confidence in the Corporation's integrity; and
- protect the integrity and reputations of Corporation members and senior staff.

2. Disclosure of Interests

2.1 All members of the Corporation and senior staff on appointment and annually thereafter will be required to complete a declaration of interests form to disclose any business or personal relationships held, financial or property interests held, or gifts or hospitality received, that could potentially result in a conflict of interests. A declaration of interests form is provided and must be used for this purpose. Any question about whether a member has an interest which should be disclosed should be referred in the first instance to the Clerk for a determination.

2.2 A register of interests will be maintained by the Clerk to the Corporation and all members and senior staff will be required to update their disclosure as and when their circumstances change. The register will be accessible by members and audit service providers and will be reviewed annually by the Corporation’s external auditors.

2.3 Where a member has previously disclosed an interest and the Chair or Clerk is satisfied that the interest is relevant to any meeting agenda item the member concerned may not be sent the papers in respect of that item and will not be allowed to vote on it (this includes voting via written resolution)

3. Management of Conflicts of Interests in Meetings etc

- 3.1 In the course of Corporation / Committee and Local Board meetings and any other activities all members and senior staff will be required to disclose any interests they have in a transaction or decision where they, their family, their employer or their close business or other associates will / may receive a benefit.
- 3.2 If a member / senior staff member fails to declare an interest known to any person attending a meeting or activity that person will declare the interest accordingly.
- 3.3 If a member / senior staff member declares an interest at any meeting /activity they must not take part in the consideration or vote on any question with respect to it and will not be counted in the quorum in relation to the resolution. The member may be asked to withdraw from the meeting, subject to a majority vote of members.
- 3.4 All decisions of the Corporation, committee or local board made following the declaration of a conflict of interest will be reported in the minutes of the meeting. The report will record:
- the nature and extent of the conflict;
 - an outline of the discussion;
 - the actions taken to manage the conflict.
- 3.5 Where a member or senior staff member benefits from any such decision, this will (if the Corporation's auditors advise this to be necessary) be reported in the annual report and accounts in accordance with relevant accounting requirements.

4. Failure to disclose a relevant interest

- 4.1 Failure to disclose a conflicting interest may lead to a member being in breach of this policy and the Corporation's Code of Conduct. It may also result in the member being subject to legal action and personal liability for breach of trust. Such breaches may lead to the Corporation considering the possibility of terminating the member's membership of the Corporation.
- 4.2 Such breaches by a senior member of staff may lead to disciplinary action being taken under the College's staff disciplinary procedures.

5. Data Protection GDPR check

- 5.1 The information provided in disclosures will be processed in accordance with the data protection principles set out in the Data Protection Act 1998. Data will be

processed only to ensure that members act in the best interests of the Corporation. The information provided will not be used for any other purpose.

6. Policy Review

- 6.1 This policy will be reviewed by the Corporation as and when legislative requirements and notification or relevant changes in charity law are received.

Appendix 1 – Declaration of Interests Form

Declaration of Interests Form

I as [Corporation Member / Co-opted Member / Senior Staff Member] of The TEC Partnership have set out below my interests in accordance with the Corporation’s Conflicts of Interest Policy.

Category	Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family, employer or some other close personal connection.
Current employment and any previous employment in which you continue to have a financial interest.	
Appointments (voluntary or otherwise) eg. trusteeships, directorships, local authority memberships, magistracy, tribunals etc.	
Membership of any professional bodies, special interest groups or mutual support organisations.	
Companies in which you hold more than 1% of the share capital.	
Gifts or hospitality in excess of £[20] accepted in the last twelve months.	
Any contractual relationship with the Corporation [or any company or other organisation connected with the Corporation].	
Any other interests which you consider are appropriate to disclose and are not covered by the above.	

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other

