

TITLE	CONFLICTS OF INTEREST POLICY
Objective	Trinity College London requires all of its employees, staff and third parties providing services to it to carry out their duties and activities associated with their work with the utmost integrity and professionalism, which includes the avoidance of situations giving rise to actual or potential conflicts of interest. This policy sets out the expectations regarding real and potential conflicts of interest and the procedures to be followed in the event of a possible conflict of interest arising.
Scope	<p>This policy applies to:</p> <ol style="list-style-type: none"> 1. All Trinity employees on the payroll and all contractors, agency or temporary workers. 2. All consultants and other service providers, including examiners, engaged by Trinity in the development, delivery or award of its qualifications and examinations. <p>The policy does not apply to Governors. Separate procedures are in place to manage conflicts of interest at board level which are administered by the Company Secretary in accordance with the company's Articles of Association.</p>
Aims of the Conflicts of Interest Policy	<p>This policy is designed to ensure that work is carried out for or on behalf of Trinity that is free from improper influence and is independent, fair and devoid of bias.</p> <p>All persons to whom this policy applies must avoid making decisions or handling matters where they have an interest that might influence, or be perceived to influence, their judgment. They must also avoid putting themselves in a position where there is or may be a conflict between the duties required as set out in their contract with Trinity and their own private interests.</p>
Consequences of Breach of this Policy	<p>Compliance with this policy is mandatory. Breaches may result in:</p> <ol style="list-style-type: none"> 1. Disciplinary proceedings up to and including dismissal for employees. 2. Immediate termination of contract for a consultant, contractor or other service provider.
What is a Conflict of Interest?	<p>In its General Conditions of Recognition (Condition A4), Ofqual states that a conflict of interest exists where:</p> <ol style="list-style-type: none"> 1. The interests of an awarding organisation in any activity undertaken by it, on its behalf, or by a member of its group have the potential to lead it to act contrary to its interests in the development, delivery and award of its qualifications;

	<p>2. A person who is connected to the development, delivery or award of qualifications by the awarding organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award;</p> <p>3. An informed and reasonable observer would conclude that either of these situations is the case.</p> <p>Put simply, a conflict of interest is a private interest which might influence a person's judgment in carrying out his contractual duties for an awarding organisation and thereby undermine the actual or perceived independence and integrity of that awarding organisation.</p>
<p>Examples of Conflicts of Interest</p>	<ul style="list-style-type: none"> • A personal relationship, whether or not declared. This might include a close professional relationship, friendship, a family tie (e.g. cousin, niece, nephew etc.), a romantic relationship etc. • A contractual relationship, for example, where an examiner is also a candidate's tutor or in the employ of the centre where he/she is conducting examinations. • A relationship where one individual is beholden to the other. For example, this might occur where gifts or hospitality have been exchanged or money has been borrowed or bribes accepted (on Trinity's policy on bribery see further below).
<p>Procedures to be Followed to Identify Possible Conflicts</p>	<p><u>Employees</u></p> <ul style="list-style-type: none"> • Contracts of employment contain an express clause prohibiting employees from having any conflicts of interest with their employment at Trinity. • If you are an employee and you find that your circumstances have changed since entering into your contract of employment, you must inform the Director of Human Resources of any potential conflict as soon as possible. <p><u>Contractors, Consultants and other Service Providers</u></p> <ul style="list-style-type: none"> • Service providers will either be prohibited from having any conflicts of interest with Trinity in their contract of services or, where a conflict cannot be avoided, will be required to declare any conflicts of interest (using the form annexed hereto) at the time of entering into their contract. • If you are a service provider and you find that your circumstances change after entering into your service contract with Trinity, you should inform your first point of contact at Trinity of any potential conflict and complete the form annexed to this policy as soon as possible. <p>In the case of examiners, examiners will be asked to declare any conflicts of interests at the time of their appointment by entering this information onto the relevant page of the Examiner Portal on Trinity Online and thereafter to keep their details updated if their circumstances change.</p>
<p>Procedures to be</p>	<ul style="list-style-type: none"> • Where you encounter an unexpected actual or perceived conflict of interest, you need to raise it immediately with your line

Followed in the Event of an Unforeseen Conflict of Interest Arising	<p>manager/first point of contact at Trinity and, in any event, <i>before you conduct the activity affected by the conflict of interest.</i></p> <p>For example, if you are an examiner out on tour and find yourself presented with a candidate that you are related to or is otherwise linked to you through a personal or professional connection, you should raise this conflict immediately with the Operations Team in London and/or the National Representative in the territory.</p> <ul style="list-style-type: none"> Where you discover the existence of an actual or possible conflict of interest after the activity to which the conflict might apply has taken place, you will again need to inform your line manager/first point of contact at Trinity immediately. You will be asked to make a record of the activity and the fact that you were unaware at the time of any conflict of interest and provide details of when and how you became aware of the conflict.
Overlap with Other Trinity Policies	<p>Conflicts of interest fall within the scope of a number of Trinity's other policies and anybody who thinks they have a conflict of interest falling into any of the examples listed above should also refer to:</p> <ol style="list-style-type: none"> Trinity's Code of Conduct which covers personal relationships between members of staff. Trinity's Bribery and Anti-Corruption policies which set out Trinity's stance on bribery and corruption for Trinity's employees and independent service providers. Trinity's Gifts Policy, which sets out Trinity's position on accepting gifts and hospitality for employees, contractors and consultants.
Retention and storage of personal data	<p>All personal data collected as part of this procedure will be stored securely at all times, in accordance with Trinity's Data Protection Policy and Privacy Statement, which can be viewed here.</p>
Review	<p>This policy is subject to the review of Trinity's Executive and/or as required by changes to legislation.</p>
Effective Date	<p>23 May 2018</p>
Date of next review	<p>23 May 2019</p>

Document Owner and Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements.

This policy was updated and approved by Trinity's Executive on 23 May 2018 and is issued on a version controlled basis under their signature.

Document History				
	Details of Amendments	Date	Owner	Approved

0.1	Policy updated to incorporate GDPR requirements	23.5.2018	Compliance Manager	
0.2				
0.3				