



Elysian

Conflicts of Interest Policy

Last Reviewed: October 2025

Date of next review: October 2026

Safeguarding Commitment

Elysian is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. This policy applies across all sites on which Elysian operates.

1. Introduction and aims

At Elysian, we want to ensure that the decisions taken by members of staff and by the Governing/Proprietor Body are free from personal bias and don't unfairly benefit any individual or company connected to the organisation.

This policy aims to ensure that everyone to whom the policy applies (see section 3):

- Understands what a conflict of interest is
- Understands their responsibility to identify and declare any conflicts of interest
- Understands what actions will be taken if a conflict of interest is identified

At Elysian, we will ensure that:

- Every potential conflict of interest, or perceived conflict of interest, is identified, recorded and prevented
- Decision-making isn't affected by conflicts of interest
- There are clear procedures for managing conflicts of interest where they arise

This policy does not form part of any employees' contract of employment. It may be amended at any time.

2. Legislation and guidance

This policy is based on a range of guidance and legislation, including information obtained from JCQ.

3. Scope

This policy applies to:

- All members of the organisation's staff
- Volunteers working in the school
- All members of the governing board
- Advisory Board members of the governing board

For the purposes of this policy, we refer to all of the above as "staff", except where we make reference to some specific roles.

4. Definitions

4.1 Conflict of interest

A conflict of interest is any situation in which a member of staff has a business or personal interest or loyalty that could or could be perceived to, prevent them from making a decision only in the best

interests of the Elysian. Conflicts of interest can be actual, potential and perceived. They may be financial, professional, personal or indirect.

It's not possible to provide an exhaustive list of what constitutes a conflict of interest, but some examples include where:

- A member of staff is related to a child within the organisation.
- A member of staff has a connection or friendship with families within the organisation
- A member of staff currently has or has had a sexual or intimate personal relationship with another member of staff
- A member of staff undertakes paid or voluntary work outside of their position at the organisation that involves children or young people from the organisation
- A member of staff is involved in invigilating examinations or assessing//submitting coursework for a learner who is known to them outside of the organisation
- A governor or senior member of staff is in a relationship with a member of staff who is in a more junior position
- A member of the governing body or advisory board also sits on the governing board of another school or trust

Employees are expected to conduct themselves in a professional, sensitive and confidential manner.

5. Roles and responsibilities

5.1 Chair of Governors/Executive Director

The Chair of Governors/Executive Director

- Ensure that the register of interests is completed each year
- Make sure declarations of interest are made before each governor meeting
- Arbitrate decisions about how to deal with conflicts of interest, where appropriate
- Monitor this policy and seek advice on any necessary changes

5.2 Clerk to governors

The clerk will:

- Maintain the register of interests, and update it when governors and members of staff inform them of changes to their circumstances

5.3 Governors

All governors and Advisory Board members will:

- Declare their conflicts of interest before or during meetings, and complete the register of interests faithfully
- Make sure they inform the chair and clerk immediately of any changes to their circumstances
- Take appropriate action to remove any conflict of interest, or seek advice on how to do so if necessary

5.4 Line managers

All line managers will:

- Communicate the conflict of interest policy to all relevant individuals within their areas of responsibility
- Review procedures annually to ensure that they anticipate and manage potential and actual conflicts of interest
- Ensure that all new staff receive conflict of interest information at induction

5.5 Members of staff

All members of staff will:

- Ensure they are familiar with the conflict of interest policy
- Read and understand the conflict of interest policy annually
- Disclose any activity or relationship that may give rise to a potential conflict of interest

6. What must be declared

6.1 What governors must declare

Governors and Advisory Board Members must declare:

- Any current business interest in a company that could stand to gain from their position on the governing board
- Any relevant pecuniary interest in any contract the school holds or proposes to enter into
- Governance roles in other educational institutions
- Material interests arising from relationships with other governors (including spouses, partners and close relatives)
- Material interests arising from relationships with members of the school staff (including spouses, partners and close relatives)
- Business interests of their spouses, partners and close relatives, where there's a possibility that the school will have dealings with that person

If a Governor or Advisory Board Member isn't sure whether something constitutes a conflict of interest, or whether it needs to be declared, they should err on the side of caution and declare it.

The headteacher and any governors/advisory board members who are staff members must declare an interest in relation to matters of their own pay and appraisal and must not participate in discussions or decisions about these.

6.2 What school staff should declare

School staff should declare:

- Any friendship or family relationship where there is a potential conflict of interest, for example a relationship between staff members, involvement in recruitment involving friends or family members etc.
- Any current business interest in a company that could stand to gain from their position as a member of the school staff
- Any relevant pecuniary interest in any contract the school holds or proposes to enter into
- Business interests of their spouses, partners and close relatives, where there is a possibility that the school will have dealings with that person
- Governance roles in other educational institutions

- Any friendship or family relationship where there is potential for a conflict of interest. Staff must be aware of potential conflicts of interest when recruiting

6.3 Conflicts of interest related to examinations

Examinations includes any accredited courses offered by Elysian, including (but not limited to) NCFE, AQA and CFI certificated courses.

Elysian recognises that conflicts of interest may arise that could lead to individuals making decisions, or appearing to make decisions that are based on personal interest and not the interest of the organisation or what is ethically correct. Such conflicts of interest may also constitute a form of corruption. Elysian subscribes to the NCFE policy on anti-bribery and corruption, which can be downloaded from the NCFE website www.qualhub.co.uk.

The organisation will manage any conflicts of interest related to examinations by informing the relevant awarding bodies about any members of staff who are teaching and preparing members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) for qualifications that include internally assessed elements.

The organisation will maintain clear records of all instances where staff have members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) entered for examinations and assessments at the school.

Staff members who will need to declare potential conflicts of interest include:

- Teachers involved in the preparation of exam papers – i.e. teachers who see question papers before an exam is taken
- Teachers who mark public exams
- Staff involved in checking examination material prior to the exam (e.g. exams officers, lab technicians for practicals, etc.)
- Teachers involved in the marking and moderation of internally assessed coursework

The organisation will:

- Contact all members of staff to ascertain any conflict of interest
- Record any confirmed or suspected conflicts and any steps taken to mitigate will also be recorded
- Share with the relevant staff member any steps taken to mitigate conflicts of interest, so they are aware of actions in place and any additional requirements they need to adhere to
- Inform any awarding bodies of any relevant conflicts of interest

Any member of staff who needs to declare a conflict of interest relating to exams should do so in writing.

Other conflicts which need to be declared may include (but are not limited to),

- Exams office staff have members of their family (which includes step-family, foster family and similar close relationships), or close friends and their immediate family (e.g. son/daughter), being entered for examinations and assessments either at the centre itself or other centres
- Centre staff are taking qualifications at their centre which do not include internally assessed components/units
- Centre staff are taking NCFE qualifications at other centres.

➤ The centre must inform the awarding body, before the published deadline for entries, of:

- Any members of centre staff who are taking qualifications at their own centre which include internally assessed components/units

- Any members of centre staff who are teaching and preparing members of their family (which includes step-family, foster family and similar close relationships), or close friends and their immediate family (e.g. son/daughter), for qualifications which include internally assessed components/units.

In all cases, clear record will be kept.

Whistle-blowing

Anyone concerned about the integrity of any aspect of the public exams process should raise their concerns with the relevant exam board. Concerns about the conduct of exams at the school should be raised with the Head of Provision.

If a concern relates to the Head of Provision, the Strategic Lead for Quality Assurance and Compliance at Elysian should be contacted. Concerns should be addressed in a reasonable and timely fashion; if they are not, the concern should be escalated in accordance with the organisation's whistle-blowing policy.

7. Procedures

7.1 Register of interests

The organisation requires each member of staff, governor and trustee to complete a declaration of interest form at the beginning of each academic year.

New members of staff, Governors and Advisory Board Members will also be asked to complete a declaration of interest form if they join after the start of the academic year.

Every member of staff, including the Head of Provision, Governors, Advisory Board Members and Senior Staff must identify and declare potential conflicts of interest. Declarations should be made as soon as possible once they are identified.

The organisation will explore potential conflicts of interest when:

- Reviewing applications for any position in the organisation, including staff member, Advisory Board and Governor appointments
- Reviewing the register of interests for Governors and Advisory Board Members. This will take place on an annual basis. Everyone who is required to complete an annual declaration must do so each year, even if there are no conflicts of interest to register
- Reviewing the agenda of Governing Body Meetings meetings. Governors and Advisory Board Members will be asked to declare any interest they have in any agenda item before it is discussed at the meeting
- Establishing relationships with external contractors. All relationships of a business or private nature with external contractors, or potential contractors should be made known to the Head of Provision. In the case of the Head of Provision, any financial interests or relationships of a business or private nature must be declared to the Chair of the Governing Body
- A member of staff changes role or responsibility

7.2 Declaring conflicts of interest and taking action (governors)

Agendas of meetings will be circulated in advance. Governors must review any agenda sent to them and alert the chair and the clerk as soon as possible if they have a conflict of interest related to any item on the agenda.

Each meeting will also include a standing agenda item to allow declarations to be made.

If a conflict becomes apparent during a meeting, and governors didn't declare these prior to or at the beginning of the meeting, they must declare these immediately.

Depending on the nature of the meeting or discussion, and the interest in question, the board will decide whether the individual needs to:

- Withdraw from the meeting
- Refrain from contributing to the discussion
- Refrain from voting on a decision

The board may also decide that, having declared the interest, the governor is free to participate in the discussion or decision as normal.

When deciding which course of action to take, the board must:

- Always make their decision in the best interests of the organisation, and be able to demonstrate this
- Act to protect the organisation's reputation
- Consider the impression that their actions and decisions may have on those outside of the organisation
- Consider the level of risk related to the decision in question, and the risk that the conflict will affect the individual's ability to be impartial, or to act only in the best interests of the organisation
- Be aware that the presence of a conflicted governor (even if they cannot participate in the decision or discussion) may inhibit free and open dialogue, and may affect the decision in some way

In cases of **serious conflict of interest**, the board may also choose to avoid the conflict by:

- Not pursuing a particular course of action
- Proceeding with the issue in a different way
- Not appointing a particular governor or employee
- Securing a resignation from a conflicted governor

A serious conflict of interest includes situations where the conflict:

- Is so acute or extensive that the individual isn't able to make their decisions in the best interests of the organisation or could be seen to be unable to do so
- Is present in significant or high-risk decisions
- Means that effective decision-making is regularly undermined or cannot be managed in accordance with the required or best practice approach

Details of any conflicts declared, and relevant actions taken, will be recorded in the minutes.

7.3 Declaring conflicts of interest and taking action (members of staff)

Recruitment of family and friends:

- Staff will not be involved in recruitment and safer recruitment processes involving family and friends
- If a family member or friend is appointed to a role, it may be appropriate to put in place alternative line management structures to eliminate a conflict of interest

Confidential information obtained during work:

- Staff should not disclose confidential information to anyone, including family and friends
- If an employee is in doubt about what information can or can't be disclosed, they should speak with their line manager

Staff whose children, (or children known in a personal capacity) attend the organisation:

- Whilst at school, the staff member's relationship with their child should follow the normal expectations that would apply with any other learner. This may need to be explained to their child to ensure appropriate boundaries are maintained
- The staff member will not be involved in any behaviour management matters relating to their child. If the staff member becomes aware of an issue, this should be discussed with their line manager
- Communication regarding a staff member's child should be carried out in the usual way. A staff member should not make use of the organisation's internal systems to gain additional information about their child

Undertaking paid or voluntary work with children and young people who attend the organisation outside school hours:

- Under no circumstances will staff ever engage in paid or voluntary work with children and young people who attend the organisation

Contractors and suppliers:

- Staff should declare a relationship to any existing or potential contractor or supplier

Misuse of position:

- Staff should not use their position to gain an advantage or disadvantage with any person or organisation
- Staff must declare any personal interest that may affect their impartiality

8. Failure to declare a conflict of interest

Governors, Advisory Board Members and Senior Staff

Failure to declare a conflict of interest is a breach of the organisation's code of conduct.

If the board becomes aware that a Governor, Advisory Board member or Senior staff member hasn't declared a relevant conflict of interest, it will immediately update the register of interests to ensure the record is complete and accurate.

Depending on the nature of the omission, the board may also:

- Vote to suspend the person
- Vote to remove the person from the board
- Follow any relevant disciplinary procedures

If a board member is aware of another board member's undeclared interest, they should alert the chair and the clerk immediately. The procurement process should then be started again.

Members of staff:

Failure to declare a conflict of interest will be dealt with in line with the staff code of conduct.

9. Links with other policies

This policy links to the following policies and procedures:

- Staff code of conduct
- Exams policy
- Whistle-blowing policy

10. Review

This policy will be reviewed every year. Any information declared will only be used for the purposes intended within this policy.

For the purposes of this policy, where the term Elysian is used, it refers to Elysian Animal Assisted Interventions Ltd and Elysian Training and Development Ltd. This policy is applicable to all Elysian sites.