Conflict of Interest Policy

POLICY APPROVAL

Approval Required	Indicate with a tick (✓)		**Annual Review Required**	Indicate with a tick (✓)	
	Yes ✓	No		Yes ✓	No
Approval Panel	Loren Janes				
Approved by	Name: Loren Janes		Signature: 	Date: November 2025	
Policy Review Date	November 2026				

Policy Statement

The purpose of this policy is to effectively identify, disclose, and manage any actual, potential, or perceived conflicts of interest in order to protect the integrity of Futures Changing and ensure that all learners—especially children, young people, and vulnerable adults—are safeguarded.

KCSIE 2025 requires all educational organisations to maintain transparency, eliminate undue influence, and ensure that no personal or professional interest compromises learners' safety, wellbeing, or the fairness of decisions relating to education, assessment, support, or pastoral care.

Futures Changing therefore requires all employees and associates to:

- Avoid conflicts of interest where possible
- Immediately declare any actual, potential, or perceived conflict
- Ensure any conflict does not compromise safeguarding, safer working practice, or decision-making
- Comply with KCSIE's expectations around transparency, impartiality, and low-level concern reporting

Conflicts of interest are common and do not necessarily pose a problem when openly declared and well managed. However, failure to disclose a conflict; particularly where safeguarding is involved; may place learners at risk and constitute a breach of statutory duty under KCSIE 2025.

Scope

This policy applies to all Futures Changing employees, contractors, volunteers, and associates and includes conflicts relating to:

- Learner relationships (family, friend, partner, carer)
- Staff relationships where a power imbalance could impact safeguarding or decision-making
- Any situation where a staff member's personal relationship might compromise impartiality under KCSIE 2025
- Staff who hold influence over outcomes for a learner (support, welfare, assessment, attendance, disciplinary decisions)
- Commercial or financial interests
- Any conflict involving a vulnerable learner or child that must also be recorded as a safeguarding concern where appropriate
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KCSIE requires organisations to eliminate situations where staff could misuse their position of trust. This includes avoiding arrangements where a staff member is responsible for or has influence over a learner with whom they have a personal connection.

Definition of *"Conflicts of Interests"*

A conflict of interest occurs when an individual's personal interests conflict, or could be seen to conflict, with their responsibility to act in the best interests of Futures Changing and the learners we support.
This includes:

- Actual conflicts – a real and current conflict
- Potential conflicts – a conflict may arise in future
- Perceived conflicts – where others could reasonably believe a conflict exists

Under KCSIE 2025, perceived conflicts must always be treated as reportable safeguarding considerations, as perception alone may undermine safer working practice or professional boundaries.

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Identification and Disclosure of Conflicts of Interest

Staff must immediately report:

- Any relationship with a learner
- Any relationship with another staff member that could impact safeguarding or decisions
- Any situation that could be considered a low-level concern under KCSIE 2025
- Any situation where their judgement relating to a child or vulnerable adult could be questioned
- Any financial, commercial, or contractual interest
- Any situation where impartial oversight of assessment, training or decision-making is compromised

Disclosures must be recorded in:

1. The Conflict-of-Interest Register (Head of People, Quality & Compliance)
2. The Safeguarding Log if the conflict intersects with behaviour, boundaries, low-level concerns, or safer working practice (DSL responsibility)

Once an actual, potential or perceived conflict of interest is identified, it must be entered into Futures Changing's register of interests, as well as being raised with the relevant manager. Where all of the other management members share a conflict, the management should refer to the Authorising Authority's procedures to ensure that proper disclosure occurs.

The register of interests must be maintained by the Head of People, Quality and Compliance and record information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it). As conflicts of interest must be recorded on the Conflict-of-Interest Log (appendix A).

Confidentiality of Disclosures

Disclosures will only be shared with:

- Senior Management
- The Designated Safeguarding Lead
- External bodies where contractually or legally required

Information will be handled in accordance with UK GDPR and KCSIE 2025 requirements for secure safeguarding record-keeping.

Managing Conflicts of Interest

Once disclosed, Senior Management (and the DSL where relevant) will determine necessary action. This may include:

- Removing the staff member from any position of influence over the learner
- Allocating an independent assessor, tutor, or manager

- Restricting involvement in safeguarding or pastoral decisions
- Adjusting line-management responsibilities
- Agreeing safer working arrangements
- Escalating to external authorities where necessary
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When determining appropriate actions, managers must consider KCSIE 2025 requirements:

- Could the conflict undermine safer working practice or blur professional boundaries?
- Could the situation undermine learner trust or create perceived favouritism?
- Does the conflict expose the learner to potential grooming or undue influence risk (direct or perceived)?
- Could the situation undermine the integrity of safeguarding, assessment, enrolment, disciplinary, or complaints processes?
- Could failing to act create a reportable safeguarding incident?

If the conflict cannot be safely mitigated, activity must not proceed without guidance from the relevant Authorising Authority.

Low-Level Concerns

Any conflict of interest that intersects with:

- Boundary concerns
- Favouritism
- Over-familiarity
- Personal relationships with learners
- Perception of special treatment

Must also be recorded as a low-level concern in line with KCSIE 2025.

This ensures:

- transparency
- early intervention
- ongoing monitoring
- safeguarding compliance

Compliance and Breaches

Failure to disclose a conflict of interest constitutes a breach of:

- Futures Changing policy
- Safer working practice expectations
- KCSIE 2025 statutory safeguarding duties

Breaches will be investigated and may result in:

- Removal from duties
- Disciplinary action
- Dismissal
- Referral to external authorities if safeguarding is compromised

Staff must also report suspected undisclosed conflicts via:

- Line Management
- Senior Management
- The DSL (if safeguarding-related)
- The Whistleblowing Policy (KCSIE requirement)

Record Keeping

All conflict-of-interest records will be:

- Stored securely
- Retained in line with GDPR
- Reviewed termly
- Cross-checked with safeguarding logs where relevant
- Audited annually

Appendix A – Conflict of Interest Log

Date	Conflict of interest identified	By Whom	Reported to	Outcome

Full details of the conflict and investigation to be recorded within the individuals staff file and are available for audit purposes.