



POLICIES & PROCEDURES

Conflict of Interest Policy

Reviewed on: 21/09/2023

Reviewed by: David Bendell

Signed: *D Bendell*

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CONFLICT OF INTEREST POLICY

INTRODUCTION

All employees are expected to adhere to the highest ethical standards in their professional and business practices. To meet these obligations, all staff should avoid conflicts of interest that may exist between outside activities and obligations to Oxford Energy Academy Limited.

PURPOSE

The objective of this policy is to encourage the full professional development of staff, while minimising the risk of unacceptable behaviour in potential conflict situations.

This policy applies to all Oxford Energy Academy Limited employees and their close relations; 'employee' means all staff including part-time, employed or otherwise engaged by Oxford Energy Academy Limited.

This policy continues to apply to employees whilst on holiday, whilst visiting other companies, and whilst consulting with external entities (awarding bodies etc).

A "close relation" means spouses, domestic partners, parents, children, siblings and each of their respective spouses or domestic partners.

Each employee owes professional loyalty to Oxford Energy Academy Limited and will be alerted to the possibility that outside obligations, financial interests, employment, and certain family or intimate relationships can affect that commitment.

All employees are responsible for determining whether they, or their close relations, have a conflict of interest or commitment covered by this policy; because no policy can anticipate the full range of outside relationships and activities that may give rise to conflicts of interest or commitment.

Employees must disclose any outside relationship or activity that may give the appearance of a conflict as soon as feasible after discovery of the conflict.

Oxford Energy Academy Limited must determine whether a conflict of interest and/or commitment is manageable before an employee may undertake the activity giving rise to the conflict. The employee must comply with all measures put in place to manage, reduce, or eliminate conflicts of interest; including any requirement, the employee provides in a follow-up disclosure at a reasonable time interval after their initial disclosure to provide an update on the status of the conflict of interest or commitment, and the employee's compliance with the measures put in place to manage it.

All disclosures as well as decisions on how to manage the conflict should be documented and maintained by the person or committee to whom disclosure is made, as provided for in this policy.

This policy does not preclude the Director, as appropriate, from requiring an employee to provide additional conflict of interest or commitment information from time to time, or to do so on a more frequent basis.

If an employee has any questions about whether an outside activity must be disclosed, the employee should consult with the Director.

DEFINITION

Professional Conflict of Interest

Under this policy, actual or potential conflicts arise when:

- financial, professional or personal considerations compromise, or have the appearance of compromising, an employee's professional loyalty and responsibility to Oxford Energy Academy Limited, or professional judgment and ability to perform their duties and responsibilities to support Oxford Energy Academy Limited best interests.
- an Employee's financial, professional or personal activities compete (or have the appearance of competing) with Oxford Energy Academy Limited or are of such nature that they would adversely impact Oxford Energy Academy Limited, or the teaching and assessing missions of Oxford Energy Academy Limited, or the quality of services provided by Oxford Energy Academy Limited to its learners and customers.
- Financial Interests.

A Professional Conflict of Interest includes, but is not limited to referring, negotiating, conducting, or overseeing any contracts, agreements, or other business relationships to or with an entity:

- from which the employee or close relation receives any compensation for services performed.
- in which the employee or close relation holds an equity interest (i.e., stocks with the company they may be employed).
- in which the employee or close relation has a management role (director, officer, supervisor, or any other position that has significant decision-making authority).

These provisions also include situations where a staff member in the employee's chain of command maintains any of the relationships described above with an outside entity, and the employee has actual knowledge of the relationship at the time they are soliciting or conducting Oxford Energy Academy Limited business with the outside entity.

Soliciting or conducting Oxford Energy Academy Limited business with or referring Oxford Energy Academy Limited business to outside companies without the Director's approval.

Employing or seeking to employ or otherwise utilise a learner's services in connection with a business venture when the teacher/staff member has an academic or advising relationship with the learner(s).

PROCEDURE

All Professional conflicts of interest must be disclosed to the Director.

- Employees must disclose potential conflicts should be made as soon as feasible after discovery of the potential conflict.
- An employee must notify the Director in writing if there is any significant change in the nature of the outside activity. This notification should be made as soon as is practical after the employee becomes aware of the change. If a disclosure relates to current learners, disclosure must be made to the Director as soon as possible.

Oxford Energy Academy Limited's Director will review the disclosure.

For disclosure reviews, the Director will develop a plan to manage, reduce, or eliminate any conflict.