HARROW INDEPENDENT COLLEGE
School of Mathematics, Science & Economics

CONFLICT OF INTEREST POLICY

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APPROVED BY: Mr. Kandiah Kandeepan (Executive Director/Principal and Head of the Centre)

POLICY DATE: 06th September 2021

REVIEW DATE: 16th April 2026

NEXT REVIEW DATE: On or before 16th April 2027

DETAILS OF THE MEMBERS OF STAFF: Kandiah Kandeepan, **Sandhya Parameswaran**

- Principal of the college - Mr Kandiah Kandeepan, kandiah@harrowindependentcollege.co.uk +447957317668

• Exams Officer -
Miss.Shandhya Parameswaran shandhya@harrowindependentcollege.co.uk

PURPOSE OF THIS POLICY - The Principal and the Governors of Harrow Independent College have a legal obligation to always act in the best interests of the college. Staff and volunteers have similar obligations. This policy is designed to protect both the college, it's Principal and Governors from any appearance of impropriety. It is also intended to ensure that no real or perceived conflicts of interests arise from the Principal's and/or Governor's personal, professional or family interests and/or loyalties could lead to a conflict with those of the college. The policy also reflects that the Board will include parents of existing students who will inevitably have an interest in decisions made which will impact on their children's education, policies which might affect their children and, on the fees paid.

The college will:

- ask all Governors and staff to declare their interests, and any gifts or hospitality received in connection with their role in Harrow Independent College on an annual basis or when any changes occur;
- store, process and use register of interests information in accordance with data protection principles set out in the Data Protection Act 1998;
- use independent external moderation where conflicts cannot be resolved through internal procedures.

HOC will:

- ensure that they have declared information about their interests and are kept up to date;
- contact the Clerk to the Governors for confidential guidance about what they should declare;
- only be involved in decisions that directly affect them or the child(ren) they care for, when they have declared their interest and be prepared to withdraw from any subsequent discussion if they consider or it may be perceived by other interested parties that they are unable to remain objective;
- be able to participate in discussions from which they may indirectly benefit, for example where the benefits are universal to all users, or where your benefit is minimal but they will declare any such interest;
- not vote on matters directly affecting their own interests. A quorum must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate;
- not be involved in managing or monitoring any contract in which they have an interest.
- maintain a register of interests and information about Governors will be accessible to the Chair of Governors;
- either in person, or through the Chair of the Governors, declare a known interest on behalf of any individual who fails to declare an interest;
- record and report in the minutes of the meeting, all decisions where there is a conflict of interest including:
  - the nature and extent of the conflict;
  - an outline of the discussion;
  - the actions taken to manage the conflict.

Please also refer to the Equality Policy.