



School of Coding & AI

Student First Always

HIGHER EDUCATION

Conflict of Interest Policy

Policy Owner: Suki Gill

Full Name	Position	Signature	Date	Review Cycle
Suki Gill	Principal		01.09.2025	Annual

School of Coding Limited T/A School of Coding & AI
Company Number: 10808021 Registered in England & Wales
Registered Address: Unit 8-8b, Newton Court, Westrand, Pendeford Business Park,
Wolverhampton, WV9 5HB



1. Introduction

At School of Coding & AI HE, we are committed to maintaining the highest standards of integrity and ethical conduct in all our operations. This Conflict of Interest Policy is designed to help staff, students, and associates recognise and disclose potential conflicts of interest and manage them in a transparent and responsible manner.

2. Definition of Conflict of Interest

A conflict of interest arises when an individual's personal interests, relationships, or activities could potentially interfere with their professional obligations or decision-making at School of Coding & AI HE. This could involve situations where personal gain might be at odds with the interests of the institution, or where external relationships could improperly influence an individual's judgement.

3. Examples of Potential Conflicts of Interest

- **Financial Interests:** Owning shares or holding a financial stake in a supplier or contractor that School of Coding & AI HE engages with.
- **Relationships:** Close relationships with individuals involved in the decision-making processes for recruitment, promotions, or awarding of contracts.
- **Outside Employment or Activities:** Holding a position with a competitor or organisation that has business dealings with School of Coding & AI HE.
- **Gifts and Hospitality:** Receiving gifts, services, or hospitality from a third party that could influence decision-making at School of Coding & AI HE.

4. Managing Conflicts of Interest

All staff, students, and associates are expected to act in the best interests of School of Coding & AI HE and to avoid situations that could lead to a conflict of interest. To manage potential conflicts:

1. **Identify Potential Conflicts:** Be vigilant in recognising situations that might present a conflict between personal interests and professional responsibilities.
2. **Disclose Conflicts Promptly:** As soon as a potential conflict of interest is identified, it must be disclosed in writing to the institute Director or a designated senior manager. This ensures transparency and allows appropriate measures to be taken.
3. **Decision on Management of the Conflict:** Upon disclosure, the institute Director will determine whether a conflict exists and, if so, decide how to manage it. This may include:
 - **Recusal:** The individual may be asked to refrain from participating in discussions or decisions related to the conflict.
 - **Restructuring of Roles or Responsibilities:** Where necessary, adjustments may be made to an individual's duties to avoid the conflict.



Other Measures: Any other steps deemed necessary to mitigate the conflict in line with School of Coding & AI HE's ethical guidelines.

5. Reporting and Oversight in England

In England, there are several bodies and authorities responsible for overseeing and reporting conflicts of interest in universities:

- **Office for Students (OfS):** The regulator for higher education in England. Universities are required to be registered with the OfS, which holds institutions accountable for conflicts of interest, governance, and other ethical standards. Complaints or concerns about conflicts of interest can be reported to the OfS.
- **Universities' Governing Body:** Each university has its own internal governance structure, typically including a board of governors or a council. Conflicts of interest should first be reported and handled by the internal governing bodies according to the university's conflict of interest policy.
- **Committee on Standards in Public Life (CSPL):** This body oversees ethical standards across public bodies, including universities. Although it does not deal with individual complaints, it sets guidelines and principles (e.g., the Nolan Principles) that institutions are expected to follow to manage conflicts of interest.
- **Charity Commission for England and Wales:** Most universities in England are also registered as charities. The Charity Commission ensures that universities comply with charity law, which includes managing conflicts of interest appropriately.
- **Ombudsman – Office of the Independent Adjudicator (OIA):** If students or staff feel that conflicts of interest have not been handled properly by the university, they can escalate their concerns to the OIA, which is an independent body that reviews complaints.
- **Equality and Human Rights Commission (EHRC):** If the conflict of interest involves discrimination, the EHRC may become involved as it is responsible for enforcing the Equality Act 2010.

These bodies work to ensure that universities operate ethically, with transparency and accountability. If internal policies are insufficient, external reporting to these agencies may be necessary.



6. Disclosure of Conflicts of Interest

All staff and associates are required to disclose any personal or professional interests that may give rise to a conflict of interest. Disclosures should be made:

- At the commencement of employment or engagement with School of Coding & AI HE.
- Whenever a new potential conflict arises, during the course of employment or engagement.
- Annually, through a formal declaration process.

Failure to disclose a conflict of interest may result in disciplinary action.

7. Confidentiality and Transparency

Disclosures of conflicts of interest will be handled with confidentiality. However, in some cases, transparency may require that information regarding certain conflicts be shared with relevant parties to ensure they are managed effectively.

8. Review and Monitoring

This policy will be reviewed periodically to ensure it remains effective and aligned with best practices. The institute Director will monitor compliance with the policy, and appropriate records of disclosed conflicts will be maintained.

9. Conclusion

All members of the School of Coding & AI HE community must act with integrity, ensuring that personal interests do not compromise the best interests of the Institute. By recognising, managing, and disclosing conflicts of interest, we can maintain trust and uphold the reputation of School of Coding & AI HE.

This policy promotes transparency and ethical conduct and ensures that all conflicts of interest are managed responsibly within School of Coding & AI HE and in compliance with relevant authorities in England.