Cardiff Academy

POLICY /// GOVERNANCE AND CORPORATE

Conflict of Interest Policy

How directors, governors, staff and agents must declare and manage personal, financial or family interests that could affect, or appear to affect, their judgement – particularly in admissions, assessment, recruitment, procurement and agent relationships.

REFERENCE	**CA-GOV-07**	VERSION	**1.0 (Approved)**
POLICY OWNER	**Chief Executive Officer**	APPROVED BY	**Board of Governors**
ISSUE DATE	**October 2026**	APPROVAL DATE	**October 2026**
REVIEW CYCLE	**Annual**	NEXT REVIEW DUE	**October 2027**
APPLIES TO	**Board, all staff, contractors and agents**	PUBLISHED	**Staff portal; summary on website**

RELATED POLICIES CA-GOV-05 Anti-Bribery, Corruption and Fraud; CA-ACA-04 Assessment, Marking and Moderation; CA-HR-01 Safer Recruitment; CA-HR-02 Staff Code of Conduct

LEGAL ENTITY Cardiff Education Group Ltd, trading as Cardiff Academy (Company No. 14569122). Registered office: 168 City Road, Cardiff CF24 3JE. Teaching premises: 8 Drake Walk, Cardiff CF10 4LG

1 Purpose

Decisions at Cardiff Academy must be made fairly and in the interests of students and the Academy. This policy helps people recognise conflicts of interest, declare them, and manage them so that decisions are, and are seen to be, impartial.

2 What is a conflict of interest?

A conflict of interest arises when a person's personal, financial, family or other interest could influence, or could reasonably be seen to influence, their professional judgement or actions. Examples include:

- a teacher who is related to, or in a personal relationship with, a student they teach or assess
- a member of staff who has a financial interest in an education agent, accommodation provider or supplier
- a governor or director with an interest in a company bidding for a contract

- a member of staff who provides paid private tuition to a current Academy student
- an admissions officer reviewing the application of a relative or family friend
- a member of staff who sits as an external examiner or adviser for a competitor

3 Principles

- Having an interest is not wrong; failing to declare it is.
- If in doubt, declare.
- A person with a conflict must not take part in the related decision.

4 Declaring interests

- **Board members and the SLT** complete a Register of Interests declaration on appointment and annually, and declare any conflict at the start of each meeting. Declarations are minuted, and the member leaves the meeting for that item where appropriate.
- **All staff** complete a declaration on appointment and annually, and declare new conflicts within five working days of becoming aware of them, using the Declaration of Interest Form.
- **Staff involved in admissions, assessment, examination administration and agent management** must declare any relationship with an applicant, student or agent before handling that case.
- **Education agents** must declare any relationship with Academy staff and any interests in competing providers or in accommodation or other services sold to students.

The Head of Operations holds the **Register of Interests**. The register for Board members is available to partner universities and inspectors on request.

5 Managing conflicts

The line manager (or, for the SLT, the CEO; for the CEO, the Chair) decides how a declared conflict will be managed. Options include:

- removing the person from the decision or activity (for example a different marker, or a different interviewer)
- additional oversight (for example second marking or moderation of all work by a related student)
- restricting access to information
- in rare cases, ending the outside interest or the relationship with the supplier or agent

The decision and controls are recorded on the Register.

6 Assessment and examinations

- Staff must not set, invigilate, mark or moderate assessments taken by a relative or by a person with whom they have a close personal relationship.
- Where the Academy acts as an examination centre for an awarding body, the Head of Centre informs the awarding body of any staff member who has a relative or close friend taking an examination, as the awarding body requires.

7 Private tuition

Staff must not provide paid private tuition to current Academy students on subjects they teach or assess, unless approved in writing by the Principal with appropriate safeguards.

8 Breaches

Failure to declare a conflict may be treated as misconduct and may lead to disciplinary action. Decisions affected by an undeclared conflict may be reviewed and set aside.

9 Review

The CEO reviews this policy annually and reports on the Register of Interests to the Board.

Compliance mapping

This policy has been written to meet, and to evidence, the following external requirements. Inspectors and university partners can use this table to locate the relevant provisions.

ISI Educational Oversight (PFE) standards	Standards 46 and 48 (proper governance and appropriate policies)
British Council Accreditation UK criteria	M8 (HR policies made known to staff)
University partner due diligence	Partner due diligence – conflicts of interest in admissions, assessment and governance
Legislation and statutory guidance	Companies Act 2006, sections 175–177 (directors' duties to avoid and declare conflicts); JCQ General Regulations (where the Academy is an exam centre)

Document control

Version	Date	Author / reviewer	Summary of changes
0.9	Pre-2026	Various	CA Conflict of Interest Policy (JCQ, 2025)
1.0	October 2026	Chief Executive Officer	New policy written for university partnerships, ISI Educational Oversight and British Council Accreditation UK. Supersedes all previous versions.

APPROVED ON BEHALF OF THE BOARD	SIGNATURE	DATE
Chair of the Board of Governors		