



# St George's College

**Founded 1898**

## **CONFLICT OF INTEREST POLICY & PROCEDURES**

*Reviewed and approved April 2023*

*Next review Jan 2024*

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# **ST GEORGE'S VISION MISSION AND VALUES**

## **VISION STATEMENT**

St George's College is a private, non-profit, bilingual, co-educational, learning institution with a long tradition in providing a well-rounded and demanding education. It delivers an international curriculum of high standards, which seeks to develop strong ethical values and character integrity, in order to allow its students to become useful and successful citizens.

## **MISSION STATEMENT**

Our mission is to provide students, between the ages of 3 and 18, with a bilingual education that integrates the Argentine and international curricula. We strive for the continual improvement in the quality of the teaching and learning, management and school resources in order that the students may develop their potential to the full. Our environment nurtures individual development, independent thinking, sportsmanship and an extensive and close interaction with the community.

## **STATEMENT OF VALUES**

Since its foundation in 1898, St George's College has been based on values adopted by its Christian founders, drawn from the best ones stemming from British tradition. These values are centred upon the following:

- Uphold honesty, integrity and truth.
- Demonstrate fortitude in terms of energy, initiative, courage and responsibility.
- Exercise good manners and respect towards people, rules, institutions, and the environment.
- Commitment and loyalty to the College, its people and society at large.
- Actively develop the concept of duty, caring and leadership through example.
- Apply perseverance and fair play in behaviour, work and play.

The College strives to uphold these values through its Governors, Staff, Parents and Students, adding to the best traditions established by its Founders.

## **1. COMMITMENT TO CONFLICT OF INTERESTS**

St George's is committed to ensuring its decisions are, and are seen to be, in the best interest of the school at all times. That they do not unfairly benefit any individual connected to the school. This policy applies to all governors, staff and volunteers of the school and sets out guidelines and procedures for identifying, monitoring and managing actual and potential conflicts of interest.

It is the responsibility of each individual within the scope of this policy to comply with its requirements. If any individual is uncertain about how this policy may affect his or her activities or has any questions about its application, he or she should contact the Headmaster or the Chair of the Board.

This policy and procedures document should be read in conjunction with:

- Complaints policy & procedures
- Whistleblower policy & procedures

## **2. AIMS**

### **COMPLIANCE**

- To ensure the school is compliant with all national laws and guidelines
- To ensure best practice from around the world

### **ONE SCHOOL**

- To establish principles efficiently across all sections and highlight procedural differences.
- To ensure where possible that resources, contracted services and support materials are implemented efficiently across all sections and wherever possible replicated.

### **FRAMEWORK**

- To provide the school's leadership a framework within which to work.
- To communicate clearly with the community what our policies and procedures are.

### **POLICY SPECIFIC**

- To ensure the activities of the school and its governors, staff and volunteers are conducted to the highest standards of ethics and integrity
- To ensure the individuals to whom this policy applies, are able to recognise activities that might give rise to conflicts of interest and declare any conflict that may arise
- To ensure the school is able to manage all arising conflicts, so that such conflicts do not affect the decision making of the school.

### **3. DEFINITION**

A conflict of interest arises where the commitments or obligations an individual owes to the School are likely to be compromised by the individual's personal gain. This includes the gain of family members or close associates, social or professional.

There may be situations where a conflict of interest does not actually exist but appears to exist. In evaluating a potential conflict, individuals should therefore consider how it might be perceived by others.

A conflict of interest may be ongoing or it may be a one-off

#### **4. RECOGNISING A CONFLICT OF INTEREST**

##### **On-going**

An example of on-going conflict is where an individual serves in the same capacity at the school as he/she does at another competing local organisation.

##### **One off**

An example of the latter is where a one-off contract is awarded to someone or an organisation with whom an Individual has a close personal or other relationship.

##### **Financial**

A financial conflict of interest for the purposes of this policy, is one where there is or appears to be the opportunity for personal financial gain, to an immediate family member or person with whom the Individual has a close relationship, or where it might be reasonable for someone to take the view that financial benefits may affect an individual's actions. Financial interest means anything of monetary value and includes without limitation, payment for services or intellectual property rights.

##### **Non-financial**

A non-financial conflict of interest for the purposes of this policy includes any non financial benefit or advantage to an individual or to an individual's immediate family member or person with whom an individual has a close personal relationship. Such benefit or advantage may include without limitation, access to services or direct or indirect career or education enhancement.

##### **Conflicts of loyalty**

Conflicts of interest may arise when there is no gain any benefit, as decision making could be influenced by other interests.

For example, loyalty to the school could conflict with loyalty to another organisation, such as :

- An employer
- A religious or political group
- A member of their family
- Another connected organisation eg trade union, charity

**Examples of conflict of interest (board)**

- A board member participates in the appointment of a person with whom he/she has a close personal relationship.
- A board member is also a board member or trustee of another school and is involved in considering a proposed collaboration between the two schools.
- A board member also holds a decision making role in a local organisation and both the school and the organisation are planning to apply for the same funding opportunity
- A board member or a member of their family has tendered for the supply of materials or services to the school

**Examples of conflict of interest (staff)**

- An academic member of staff is on the editorial board of a journal and is also on a school committee that recommends journal subscriptions.
- A staff member takes part in the negotiation of a commercial contract between the school and a company in which his/her family member is a director.

**Examples of conflict of interest (volunteers)**

- A volunteer who comes in to help on the reading programme recommends the purchase of books published by a company in which he/she has an interest.
- A parent volunteer who is involved in the decision about his/her child's award of a prize or other award.

## **5. DISCLOSURE**

All interests that potentially lead to a conflict of interest, however small, should be disclosed. In doing so it must be remembered that what may be immaterial or insignificant for one person may not be for another. Therefore a conflict will arise if the interest might provide, or be reasonably seen by others to provide an incentive to the Individual that may affect his/her actions, and where he or she has the opportunity to affect a school decision or other activity (for example, where the individual is involved in decision making).

It is the duty of every individual to disclose any conflict or any circumstances that might reasonably give rise to the perception of a conflict. All interests, and any gifts or hospitality received in connection with an individual's role in the school must also be disclosed on an annual basis or when any changes occur.

As a general rule, with the exception of Board business, disclosure should be made at the time the conflict first arises, or when it is recognised that a conflict might be perceived.

Disclosures should be made in writing to the Chairman of the Board.



## **6. PROCEDURES**

It is the responsibility of individuals affected to comply with the agreed conflict management approach. Board meeting and each committee meeting should contain a standing agenda item about conflict of interest. During the first meeting of the academic year the item will also explain what a conflict of interest is and how they should be declared and managed as appropriate. It is the responsibility of members of the Board to declare any interest that could give rise to a conflict in relation to any item on the agenda at the beginning of the item. Any interest disclosed will be recorded in the minutes, including:

- The nature and extent of the conflict
- An outline of the discussion
- The actions taken to manage the conflict.

### **Contract Management**

The school will ensure the probity of all financial transactions. The purchase of goods or services by the School will be carried out in accordance with financial regulations. As a general rule, Individuals to whom this policy applies should not be involved in the supply or purchase of goods or services, or in any way they might have the capacity for personal gain.

In exceptional circumstances that require such involvement, the following process should be followed:

- the Individual should disclose the nature of the transaction and potential conflict in writing to the Chair of the board
- A approach must be agreed to manage the conflict and protect the integrity of the school and the individual
- Compliance with the law and good practice must be ensured.

Any contract awarded where a potential conflict of interest has been identified will be monitored by the Boa of Governors to ensure that the approach adopted is being followed. Individuals shall not be involved in managing or monitoring of any contract in which they have an interest.

The requirement in this policy that individuals should not unfairly benefit from their connection to the school does not mean that:

- An individual cannot be reimbursed for expenses.
  - Any costs that are necessary to allow a governor to carry out the duties attached to his/her duties are legitimate expenses for which he/she can be reimbursed against receipts or met directly by the school.
  - Such expenses can include, travel costs or the cost of providing care for a dependent whilst attending a meeting of the Governing Body or when undertaking school business.
  - Training costs.
  
- An individual, his/her family members or others with whom an individual has a close personal relationship cannot receive services from the School.
  - Such benefits can be received provided they are received by the beneficiaries on exactly the same basis as anyone else.

Some situations will need to be dealt with by agreeing how the conflict can be actively managed. The approach adopted should be documented and copies provided to the relevant Individuals. One or more of the following measures may be appropriate to manage the conflict:

- Not taking part in discussion of certain matters.
- Not taking part in the decision making of certain matters.
- Referring decision making to others.
- Not taking part in a particular project or activity.

## **7. REGISTER OF PERSONAL INTERESTS**

It will be appropriate to deal with some situations by way of a declaration by the individual in the school's register of personal interests . Maintenance of this register is a requirement of the Board of Governors

The register will be maintained by the Chair Governing body in line with best practice guidance and will be published on the school's website and updated on a termly basis.

## **POLICY REVIEW**

This policy is to be reviewed by SLT and presented to the Board of Governors for final consideration and approval.

Approved by the Board of Governors, signed:

Dr Francisco Follett, Chairman

James Belmonte Diver, Headmaster

**Date:**