

Title: Conflict of Interest Policy

Approval by: Principal

1 Purpose

The policy's purpose is to have clarity in effectively identifying, disclosing and managing any potential, actual or perceived conflicts arising from competing interests. The policy aims also to protect IST and its staff, board and students from the effects of any conflict of interest. All employees and board members have a duty to take steps to prevent a conflict of interests within IST.

2 Objective

The **Conflict of Interest policy** aims to ensure all staff and board members clearly understand their obligations to disclose an actual, perceived or potential conflict of interest, to adhere to the policy as outlined, and to be aware of the serious implications of any such conflict of interest, especially its misuse and failure to manage.

3 Definition

A conflict of interest is any situation where an individual has competing loyalties or interests. A **Conflict of Interest** is defined as *any circumstance in which the personal, professional, financial, or other interests of an employee may potentially or actually diverge from, or may be reasonably perceived as potentially or actually diverging from, his or her obligations to IST and the interests of IST.*

It includes indirect conflicts, such as benefits provided to an immediate family member of an employee.

Such a conflict of interest can occur:

- Where personal interests and friendships conflict with an individual's professional position at IST;
- Where personal interest in another organisation competes with an individual's position at IST;
- Where there are conflicting responsibilities within and outside of the school.

Examples of a conflict of interest can include:

- A member of staff with a child who is a student at IST;
- A member of staff or a board member who has a close friendship with clientele;

- A member of staff holding another employment, or either tutoring or offering services to a student attending IST;
- A member of staff having close connections with families at IST through social networking.

4 Policy

Employees should actively seek to avoid conflicts of interest. No employee or board member should allow their outside activities to interfere or affect their work, colleagues, clientele (both students and parents) or workplace environment. No employee or board member should use or exploit their position at the school, connection to IST, or information gained from working at or with IST, for their own or other parties' private interest. No employee or board member should act in a manner that could bring IST into disrepute or effect its reputation or the reputation of a colleague or individual working at IST.

An employee or board member (i) must promptly **disclose** any conflict of interest and should anticipate the possibility of a conflict of interest whenever possible so that the possible conflict of interest can be reviewed prior to occurrence; and (ii) where relevant, cooperate with any plan adopted by IST to manage, reduce, or eliminate the conflict of interest.

This policy is designed to protect IST, its staff and board from any appearance of impropriety. It is also intended to ensure that no real or perceived conflicts of interests arise from a staff or board member's personal, professional or family interests and/or loyalties could lead to a conflict with those of the school. The policy also reflects that the Board will include parents of existing pupils 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 School will:

- Ask all board members and staff to declare their interests, and any gifts or hospitality received in connection with their role in IST on an annual basis or when any changes occur;
- Store, process and use a register of interests information in accordance with data protection principles;
- Use independent external moderation where conflicts cannot be resolved through internal procedures.

Responsible management of the Conflict of Interest policy is based on the following four principles:

- Protecting the organisation's interest through upholding established organisational values;
- Supporting transparency and accountability;
- Promoting individual responsibility for integrity and impartiality;
- Developing a positive organisational culture which encourages effective management.

5 Action

An individual should actively avoid any conflict of interest and stop any of its effects from harming the school or other individuals. If there is an instance of conflict of interest, then the leadership of the school in consultation with the board will take action to manage, reduce and eliminate the effects. This action could be a management plan and should also be subject to the context and individual involved, be the individual a staff member or board member. A serious conflict or misuse of the policy should be brought directly to the principal or board chair, dependent on the issue.

Violations and misuse of the policy will be subject to disciplinary action, up to and including the termination of the individual's association or work at IST. Such action will be in accordance with the disciplinary regulations at IST (as laid down in the Staff Handbook), IST employment contracts, and with Norwegian law.

Notes:

- *A close relationship is seen as a family relationship, personal friendship or partnership, marriage or business relationship.*
- *This policy applies to any circumstance that may constitute a Conflict of Interest, regardless of whether it is specifically described in this policy. For example, while personal interests of employees are defined to include those of the person and his or her Immediate Family Members, there also may be situations where the interests of other persons, such as a close friend or other family member, create a Conflict of Interest.*

References:

We acknowledge the following websites and policies that have been used in making this policy:

- <http://www.foundryroadpreschool.co.uk/node/46>
- <http://www.education.vic.gov.au/hrweb/workm/Pages/Conflict-of-Interest.aspx>
- <https://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/employee-policy-on-conflicts-of-interest.html>
- https://www.theadleholmeschool.co.uk/files/school_policies/conflict_of_interest_policy.pdf

- <http://www.acnc.gov.au/ACNC/Publications/COIguide/COIGuide1.aspx>
- <http://www.charterschooltools.org/tools/ConflictofInterestPolicy.pdf>