

Conflict of Interest Policy

INTRODUCTION

1. The Seven Principles of Public Life (known often as the ‘Nolan Principles’) include the principle of integrity – stating that holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
2. Digital Marketing School (DMS) has adopted this Policy to address conflicts of interest, so as to ensure that all activities are conducted against the highest standards of ethics and integrity.
3. Where an individual has a private interest (financial or otherwise) which could overlap with their duties for Digital Marketing School then this interest must be disclosed and managed appropriately. This Policy sets out the mechanism for doing so.

DEFINITIONS

4. A conflict of interest is a situation where an individual’s private interests are in (or may appear to be in) conflict with the interests of the DMS. It is not that individuals cannot have private interests, but rather that these interests should be declared where they might reasonably be foreseen to be in conflict.
5. This policy covers all conflicts – whether real or perceived. Put differently, where there might appear to be a conflict of interests when viewed from outside the organisation, then these must be declared.
6. This Policy, therefore, is a mechanism for protecting DMS (and its staff and Directors) against criticism or compromise by ensuring that they recognise and disclose such conflict situations and take steps to avoid or manage them.

SCOPE

7. This Policy applies to all those engaged as workers by DMS, regardless of the basis on which they are paid, and to all its Directors.
8. The Director will determine who shall be required to complete registers of interest declarations. Regardless of this, the need to avoid conflict shall apply to all staff, regardless of whether they are expected to complete such a declaration.

DISCLOSING INTERESTS

9. On appointment, those subject to the explicit declaration processes (as determined by the Director as set out at paragraph 8 above) will be asked to declare private interests in line with the form attached at Appendix 1. An annual review of the Register of Interests will be undertaken but individuals should not wait for the review to correct their personal declaration.
10. Those subject to explicit declaration requirements shall disclose:
 - All appointments (paid or unpaid) with an external body or entity which could potentially have an overlap with DMS.
 - The interests of anyone with whom the individual has a significant personal relationship where you normally have knowledge of such interests (a “Connected Person”) as if they were their own interests. This could include a partner, children under 18, anyone living in the same home where you share information about interests, and anyone whose financial affairs you have responsibility for or control over.

DETERMINING WHETHER A CONFLICT EXISTS

11. The majority of interests will not create a conflict, but it is each individual’s responsibility to consider whether there is an actual or perceived conflict between interests (regardless of whether they are subject to the explicit declaration process) insofar as they relate to their activities with the DMS. Even where an individual has declared an interest they are still responsible for considering and identifying potential conflicts.
12. If an individual believes they have an actual or potential conflict of interest, or if they are unsure if a conflict exists, they should discuss it with the Director in the first instance. The Director will determine what action might be needed. This may include requiring the individual concerned to recuse themselves from consideration of particular issues.

13. If a conflict arises, it is not sufficient to rely on a declaration made previously – the conflict itself must be identified.

MANAGING CONFLICTS

14. Where a conflict is identified the Director will work with the individual to determine the materiality of the conflict. This will involve assessing all of the relevant factors including but not limited to:

- The nature of the conflicting interest
- The employee's role in the decision-making processes
- The value and nature of any benefit the employee could receive.
- The impact on reputation for the individual and/or DMS
- The impact on the individual's ability to do their duties.

REGISTER OF INTERESTS

15. All disclosed interests will be noted on a Register of Interests, as set out in Appendix 1, maintained by the Account Manager. Access to the disclosures will be restricted in line with the principles of data protection in place within the DMS.

16. In order to ensure that the information on the register is relevant and current, staff will be required to review their declarations on an annual basis.

CONCLUSION

17. Most situations will require no more than a declaration of the interest or activity which will be stored on the Register of Interests. There will, however, be some instances which need to be dealt with by agreeing how the conflict can be managed. In these instances, the agreed approach should be documented between the DMS and the individual. It is the responsibility of those affected to comply with the approach that has been agreed.

Appendix 1 - Register of Interests

Name: _____

Category	Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family, connected persons or some other close personal connection.
Current employment (and any previous employment in which you continue to have a financial interest).	
Other appointments (voluntary or otherwise), e.g. trusteeships, directorships, local authority memberships, etc.	
Membership of any professional bodies, special interest groups or mutual support organisations.	
Investments in companies, partnerships and other forms of business, major shareholdings, including those where shares may be held in Trust and you hold the beneficial interest.	
Gifts or hospitality offered to you by external bodies in line with your work with DMS over the last twelve months, and whether this was declined or accepted.	
Details of usage of DMS services as a customer.	
Any contractual relationship with DMS not covered above.	
Any other conflicts that are not covered by the above where you believe these may have the potential to cause conflict.	

To the best of my knowledge, the above information is complete and correct. I undertake to update the information provided as necessary, and to review the accuracy of the information at least annually.

I consent for the data included herein to be used for the purposes described in the Conflicts of Interest Policy.

Signed: _____ Date: _____