

Glasgow Kelvin College

Equality Impact Assessment

Conflict of Interest Policy



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Practitioners conducting assessment		
Name	Designation	Date
Doreen Shields	Director of Human Resources	30.11.16
Patricia Currie	EDI Manager	02.12.16

Step 1 – Identification and Scope

Brief description of the decision, policy or practice being assessed

Conflict of Interest Policy to ensure that trustees comply with their statutory obligations to act in the best interest of the charity and the regulatory framework of the charity namely the College.

Aims of the decision, policy or practice?

To assist members, as a trustee of a charity, to avoid conflicts of interest and to act appropriately where a conflict of interest arises. Document sets out how members and those attending the Board of Management or its standing committees should manage conflicts of interest.

Who is affected by the decision, policy or practice?

- Students
- Staff
- Members of the public/Stakeholders

Step 2 – Research and Consultation

Outline evidence / research

OSCR Guidelines;
Mazars guidance; and
Conflict of Interest Policies from other charity organisations.

What consultation has been undertaken on this policy or practices, including consultation with those affected?

Senior Managers; and
Clerk to the Board of Management

Research Key Findings

When developing the policy a number of key documents were considered which contain the regulatory requirements and best practice. The Policy reflects the requirements of the College, the legislation and a range of best practice.

The aim is to ensure that should a conflict of interest arise when a trustee's personal interests impact on the work of the College that they manage any situation appropriately. The document provides some examples of financial and non-financial areas where conflict may arise. It also details how a conflict of interests should be managed providing clear guidance to members.

Is there any evidence that different groups have, or may have, different needs, experiences and priorities in relation to this policy or practice?

Protected Characteristic	Yes (+ or -)	Potentially (+ or -)	Neutral (no impact)	Not known
Age			+	
Disability			+	
Gender			+	
Gender reassignment			+	
Marriage and Civil partnership			+	
Pregnancy and Maternity			+	
Racial group			+	
Religion or belief			+	
Sexual orientation			+	

Step 3 – Assessing the Impact

What impact could the proposal have on people who share protected characteristics (positive, negative and/or neutral?) Please provide details below.

Protected Characteristic	Likely Impact
Age	The policy applies to all regardless of age.
Disability	The policy applies to all regardless of disability. It is available on intranet and therefore available in different fonts, text size and through assistive technology.
Gender	The policy applies to all regardless of gender.
Gender reassignment	The policy applies to all regardless of gender reassignment.

Protected Characteristic	Likely Impact
Marriage and Civil partnership	The policy applies to all regardless of marital status.
Pregnancy and Maternity	The policy applies to all regardless if the woman is pregnant or is/has been absent previously on maternity leave.
Racial group	The policy applies to all regardless of race.
Religion or belief	The policy applies to all regardless of religion or belief.
Sexual orientation	The policy applies to all regardless of sexual orientation.

Step 4 – Taking Action

Detail the actions you would take to remove or minimise any actual or potential negative impacts identified, and to build positive impacts.

Policy issued to all existing members to raise awareness;
 Policy issued to all new members as part of induction process;
 Policy available on the intranet and internet;

Step 5 – Monitoring and Evaluation

Identify how this policy will be monitored and any areas of concern reported.

Monitoring and evaluation lies with the senior management team. Processes include:

- record any conflicts of interest;
- annual audit of conflict of interest incidents; and
- annual reporting of incidents to the Board of Management.

Please present your EIA with recommendations for endorsement. All EIAs will be published on the Portal and added to the current record of EIAs.

Step 6 – Approval – Equalities Committee

Identify outcome

<p>A. Proceed –</p> <ul style="list-style-type: none"> • no potential identified for discrimination or adverse impact, and: • all opportunities to advance equality have been taken. 	Yes
<p>B. Proceed with adjustments to:</p> <ul style="list-style-type: none"> • remove barriers identified or • better advance equality. 	
<p>C. Stop and rethink as actual <i>or</i> potential unlawful discrimination has been identified.</p>	

Approved	Yes
*Not Approved and Requires Further Information	

**Please add Comments*

Person(s) responsible

Name	Designation	Date

Signed Date

Signed Date

Central Monitoring

Once your EIA is complete:

1. add it to the EIA monitor on the Equalities Section of the Intranet
2. In Col A. Insert Title **and** Hyperlink Doc

NB: Finalisation of central monitoring & identification of compound impact will be undertaken within Equalities Management.

Appendix

Equality Act General Duty requires colleges to have **due regard** to the need to:

1. **Eliminate**
 - a) discrimination,
 - b) harassment,
 - c) victimization; or
 - d) any other prohibited conduct

2. **Advance** equality of opportunity by
 - a) removing or minimising disadvantage
 - b) meeting the needs of particular groups that are different from the needs of others
 - c) encouraging participation in public life

3. **Foster** good relations – tackle prejudice, promote understanding

Protected Characteristics:

1. Age
2. Disability
3. Gender Reassignment
4. Marriage And Civil Partnership (applies only in relation to (1a) discrimination in *employment*, not to learners)
5. Pregnancy And Maternity
6. Race
7. Religion Or Belief
8. Sex/ Gender
9. Sexual Orientation.