



Glasgow Kelvin College

Equality Impact Assessment

Board of Management Conflict of Interest
Policy

Review Date – February 2026

Contents

Step 1 – Aim, Outcomes and Information	3
Step 2 – Research and Consultation	4
Step 3 – Assessing the Impact	5
Step 4 – Taking Action	5
Step 5 – Monitoring and Evaluation	6
Step 6 – Approval	6
Appendix	7

Title of Policy, Procedure or Practice:

Board of Management Conflict of Interest Policy

Type of Policy, Procedure or Practice:

New

Existing, Reviewed or Revised

Team Leading Impact Assessment:

Corporate Governance

Lead Person:

Annette McKenna

Date of Assessment: November 2024

Aims and Outcomes

What are the intended aims / outcomes of the policy, procedure or practice? Who is the target audience and who is it intended to benefit?

This policy is intended to assist members as a trustee of a charity, to avoid conflicts of interest and to act appropriately where a conflict of interest arises. It sets out how members and those attending the Board of Management or its Standing Committees should manage conflicts of interest and connections.

Evidence and Information

What information has been used as the basis for this EIA?

Board of Management Corporate Governance Framework
Code of Good Governance for the College Sector

Which individuals, groups or organisations representing protected characteristics have been involved in the undertaking of this assessment?

What does the information indicate about potential positive, neutral or negative impacts for each protected characteristic?

Protected Characteristics	Potential Impact
Age	<ul style="list-style-type: none"> • Impact: Neutral to Positive • Rationale: An emphasis on transparency and inclusivity can help trustees across all age groups feel empowered to manage conflicts without bias. • Support Actions: <ul style="list-style-type: none"> • Provide training on conflict management geared to diverse age groups. • Foster a culture where all trustees, regardless of age, feel equally empowered to disclose and manage conflicts.
Disability	<p>People who are blind or partially sighted or have a learning difficulty may not be able to have access to this information</p> <ul style="list-style-type: none"> • Impact: Neutral to Positive • Rationale: Ensuring accessible resources and accommodations helps trustees with disabilities participate fully in conflict management procedures. • Support Actions: <ul style="list-style-type: none"> • Offer accessible formats for all policy documents and resources. • Ensure meeting rooms and communications are accessible, and

	<p>provide additional support if needed, such as interpreters or captioning for those with hearing impairments.</p>
<p>Gender Reassignment</p>	<ul style="list-style-type: none"> • Impact: Neutral to Positive • Rationale: Ensuring trustees feel safe to disclose connections without fear of bias promotes a supportive environment for all. • Support Actions: <ul style="list-style-type: none"> • Foster a respectful environment for open discussion of potential conflicts. • Emphasize the confidentiality and non-discrimination aspects of the policy to encourage transparent disclosures.
<p>Marriage and Civil Partnership</p>	<ul style="list-style-type: none"> • Impact: Neutral • Rationale: The policy is inclusive and equally applicable to trustees in any marital status or civil partnership. • Support Actions: <ul style="list-style-type: none"> • Offer clear guidance on disclosing conflicts that may arise from marital or partnership connections. • Ensure a neutral process that respects all relationship statuses when assessing conflicts.
<p>Pregnancy and Maternity</p>	<p>None</p> <ul style="list-style-type: none"> • Impact: Neutral to Positive • Rationale: By accommodating trustees with flexible arrangements, the College can support continued compliance with the policy during periods of maternity leave. • Support Actions: <ul style="list-style-type: none"> • Provide options for remote attendance or delayed reporting if a trustee is on leave. • Offer flexibility in timing or format for conflict disclosure, ensuring that trustees

	<p>on maternity leave can engage at their convenience.</p>
<p>Race</p>	<p>People who cannot read English will not be able to have access to this information.</p> <ul style="list-style-type: none"> • Impact: Neutral to Positive • Rationale: Supporting transparency and ensuring cultural awareness can foster an environment where trustees from all backgrounds feel respected in declaring conflicts. • Support Actions: <ul style="list-style-type: none"> • Promote awareness and sensitivity to potential cultural or community-based conflicts. • Provide confidential channels for disclosure to encourage openness without fear of bias.
<p>Religion or Belief</p>	<p>None</p> <ul style="list-style-type: none"> • Impact: Neutral • Rationale: The policy can support trustees by promoting a neutral and respectful approach to managing religious conflicts of interest. • Support Actions: <ul style="list-style-type: none"> • Offer guidance on handling conflicts related to religious organizations. • Encourage respectful, confidential disclosures without judgment on religious connections.
<p>Sex</p>	<p>None</p> <ul style="list-style-type: none"> • Impact: Neutral • Rationale: A gender-neutral policy that supports all trustees equitably can prevent any gender-related bias in conflict disclosures. • Support Actions: <ul style="list-style-type: none"> • Promote a culture where all trustees feel equally empowered to disclose conflicts, regardless of gender.

	<ul style="list-style-type: none"> • Reinforce that conflict disclosures are expected and respected from all members equally.
<p>Sexual Orientation</p>	<p>None</p> <ul style="list-style-type: none"> • Impact: Neutral to Positive • Rationale: A supportive, confidential approach to conflict disclosure ensures that LGBTQ+ trustees feel safe in declaring relevant connections. • Support Actions: <ul style="list-style-type: none"> • Highlight confidentiality and non-discrimination principles to encourage open disclosures. • Provide resources or guidance on handling disclosures related to sexual orientation with sensitivity.

Are you able to reduce any potential negative impacts identified? If so, how?

- | |
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| <ol style="list-style-type: none"> 1. produce information in a specific language where there is a specific need, if required. 2. produce information in a specific format for blind or partially sighted people as recommended by groups (look at font size, coloured paper), if required. |
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Compliance with General Equality Duty

Does the policy, procedure or practice comply with the three parts of the general duty?

- **Eliminate discrimination, harassment and victimisation and other conduct prohibited by the [Equality Act \(2010\)](#)**
- **Foster good relations between people from different groups - this involves tackling prejudice and promoting understanding between people from different groups**
- **Advance equality of opportunity between people from different groups**

Yes No

If no, what arrangements could be implemented to better comply with the duty?

What is the EIA outcome?

A positive impact is likely	<input type="checkbox"/>	A negative impact is not foreseen	<input type="checkbox"/>
A negative impact is likely	<input type="checkbox"/>	A negative impact is probable or certain	<input type="checkbox"/>
Are you able to introduce the policy, procedure or practice without changes?	Yes	<input type="checkbox"/>	No <input type="checkbox"/>

If no, what changes will you make before implementation?

Action and Monitoring

What action will be taken, by whom and when?

Once implemented how the policy will, procedure or practice be monitored?

- Board members will be required to fill in a register of interests which will be held by Secretariat
- Commendations and Complaints Procedure

Signed: Annette McKenna / Amrit Kaur Bedi

Date: November
2024

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 students)
- 5. Pregnancy And Maternity
- 6. Race
- 7. Religion Or Belief
- 8. Sex/ Gender
- 9. Sexual Orientation.