



CONFLICT OF INTEREST POLICY

1. Introduction and Scope

Jimmy Choo Academy (JCA) is committed to the highest standards of integrity, transparency, and accountability in all of its operations. The Academy recognises that its staff, students, and governors may engage in a broad range of professional and external activities, including consultancy, collaborations, and public engagement. Such participation is encouraged but must be undertaken transparently to avoid or manage conflicts of interest. Declaring a conflict of interest implies positive assurance not misconduct or lack of integrity; it demonstrates accountability and transparency.

Conflicts of interest may arise where an individual's personal or family interests and/or loyalties conflict with those of the Academy. These interests may be financial or emotional. Such conflicts may create problems, as they can:

- Inhibit open discussion.
- Lead to decisions that are not in the best interests of the Academy.
- Create the impression of improper conduct.

This policy applies to all individuals engaged in the work of the Academy, including members of the Board of Governors, the Senior Management Team, academic and professional staff, students, contractors, and external collaborators. All members of the Academy community are required to identify and disclose any activities or relationships that may give rise to a real, potential, or perceived conflict of interest and to take appropriate steps to ensure that such conflicts are transparently managed, mitigated, or avoided in accordance with this policy.

The purpose of this policy is to ensure that all actual, potential, or perceived conflicts are identified and managed appropriately to protect the reputation, objectivity, and integrity of the Academy's governance and operations.

The principal, supported by the Board of Governors and the Senior Management Team, has a paramount legal obligation to always act with the utmost good faith and in the best interests of the Academy, in accordance with its governing documents, as well as ensuring that the Academy acts in accordance with general law.

It is recognised that those who are employees of the Academy may, on occasion, have to make decisions where the interests of the Academy and the employers/students are, to a degree, opposed.

This policy should be read alongside related Academy policies and procedures, including the Anti-Bribery Policy, Gifts and Hospitality Policy, Whistleblowing Policy, Safeguarding Policy, and Staff-Student Relationship Policy, all of which support integrity and compliance.

2. Identifying Conflicts of Interest

Conflicts may be actual (currently influencing), potential (could influence in the future), or perceived (appear to influence). All forms must be treated seriously and declared in line with this policy

Conflicts of interest can take many forms and may be financial, personal, or professional. Examples include but are not limited to:

- Holding a financial or ownership interest in a supplier, partner, or contractor engaged by the Academy.
- Having a close personal, family, or romantic relationship with an applicant, student, colleague, or business associate.
- Accepting gifts, benefits, or hospitality that could influence, or be perceived to influence, decision-making.
- Serving on external boards, advisory panels, or committees where responsibilities may overlap with those at JCA.
Engaging in external employment, consultancy, or freelance activity that competes with or conflicts with JCA's interests.

Whenever a member of the Board of Governors, Management Team, staff or student has a personal interest in a matter to be discussed at a meeting of the Academy or in a prospective commercial or financial dealing with an outside body, the individual concerned must, in the case of matters arising at meetings:

- declare an interest in or before the discussion begins on the matter.
- Withdraw from the meeting for that item unless invited to remain to provide information.
- not be counted in the quorum for that part of the meeting
- withdraw during the vote and have no vote on the matter.

In other dealings where individuals are acting on their own or in collaboration with others outside the context of a meeting, before concluding any arrangement, the matter must be discussed with an appropriate Academy officer, line manager or student representative.

Conflicts of loyalty may also arise where personal obligations or affiliations to individuals or organisations compete with the duty owed to the Academy, even when no financial interest exists.

When determining whether a conflict exists, the Academy applies the principle of the “fair-minded and informed observer”: whether an independent person, considering the facts, might reasonably perceive a real possibility of bias.

3. Responsibilities and Disclosures Process

Individuals must declare conflicts as soon as they become apparent, through their line manager or relevant senior officer. Where the matter involves a senior manager, it should be referred to the Principal. Conflicts involving the Principal must be reported to the Chair of the Board of Governors.

Failure to disclose a known conflict may result in disciplinary action for staff and students, or formal censure for governors, depending on the circumstances.

JCA students are also required to declare those interests that might conflict with their duty of loyalty to the Academy in connection with their role in the Academy. For example, a student should disclose a conflict of interest if they are negotiating a contract for a student event in the Academy and the service provider is owned by a family member or a personal friend. Students can seek confidential guidance from the Student Engagement Team.

Gifts, vouchers, or payments received personally by any member of staff or students from suppliers because of a purchase in connection with their role in JCA must be disclosed immediately to the Line Manager or Student Engagement Team, in the first instance.

Hospitality of a value over £50 received by any member of staff or student in connection with their role in JCA should be disclosed to the Finance Department. For the avoidance of doubt, this excludes the receipt of hospitality associated with giving presentations at conferences or seminars.

The Head of Finance should be notified promptly of the receipt of any gifts or hospitality of a value over £100 received by any member of the Senior Management Team. A register of interest in all such gifts shall be maintained. Please refer to our Anti-Bribery policy, which sets out ethical behaviour and financial probity and reliability.

Where the matter concerns a senior manager, it is reported to the Principal. Where it concerns the Principal, it is reported to the Chair of the Board of Governors.

In addition, members of the Senior Management Team, the Board of Governors, and staff involved in procurement or recruitment will be required to complete an annual declaration of interests. These declarations will be reviewed by the Governance Office and retained in a central register

4. Managing Conflicts of Interest

The Academy employs the following strategies to manage conflicts:

- Recusal: Individuals should not participate in discussions or decisions where they have a conflict.
- Transparency: In some cases, disclosure and recording the conflict may be sufficient.
- Divestment: In financial conflicts, divesting interests may be required.
- Standing Aside: Individuals may need to step aside from involvement in certain projects.
- Referring Decisions: Transferring decision-making authority to uninvolved parties.

If a conflict cannot be managed, the individual may need to withdraw from the activity or role.

Upon disclosure, a Conflict Management Plan will be agreed upon, setting out how the conflict will be mitigated or monitored. This plan will outline the necessary actions (e.g., recusal, reassignment, disclosure to affected parties), identify the responsible officers, and establish a review timeline. The Governance Office will retain a copy of all management plans, which may be audited annually for assurance.

Where a staff member has no formal responsibility for a student, but a personal relationship exists, the Academy still encourages caution to avoid any appearance of impropriety. Staff are encouraged to disclose these relationships to their line manager or HR, particularly if there is a risk that the staff member may later acquire responsibility for the student.

All staff and students must complete conflict of interest training as part of induction, with periodic refresher sessions to reinforce awareness and compliance

5. Specific Scenarios

JCA Staff

Conflicts of interest can be financial and non-financial, and a potential gain can be personal or a benefit to someone with a connection to a member of staff. Commitments and obligations can also be compromised. The issue is not the integrity of the member of staff concerned but the management of any potential to be influenced by conflicting loyalties. Even the appearance of a conflict of interest can damage reputations, so it must be managed carefully.

The following information provides guidance on the identification and management of actual, perceived or potential conflicts of interest that may be encountered by members of JCA staff.
Research, Consultancy and Intellectual Property

Staff and students involved in research, consultancy, or creative enterprise must disclose any financial interests, sponsorships, or affiliations that could influence the design, conduct, or dissemination of their work. This includes shareholdings, directorships, or personal IP arrangements. Any such interest must be declared to the Research and Ethics Committee prior to project commencement.

Recruitment of new staff

Staff involved in the recruitment and selection process must immediately declare to the Senior Management Team any conflict or potential conflict of interest, at which point, in the interests of fairness to all candidates, they will not be permitted to continue to participate. For example, it would not usually be appropriate for a member of staff to be a member of a recruitment panel where an applicant is a member of their spouse's family. Staff members can seek confidential guidance from HR.

The declaration and management action will be recorded on the recruitment file and an independent panel member will replace the conflicted individual
Relationships involving a supervisor or line manager

It would normally not be appropriate for members of staff in a direct or indirect management or supervisory role to be involved in management activities relating to the member of staff with whom they have a relationship, for example:

- Authorisation of financial payments or expenses
- Salary payments
- Recruitment, selection, or appointment including the provision of references
- Progression and promotion
- Probation

Relationships between members of staff and suppliers

Where members of staff have personal relationships with consultants, contractors or suppliers who provide goods or services to the Academy, and they can influence contracts or the tendering process, such personal relationships must be disclosed to the Head of Finance in good time. The Academic Lead must consult the Senior Management Team, who will take the matter with the Head of Finance in confidence to determine whether the member of staff should take any part in determining the price or conditions associated with the contract. This duty of disclosure applies equally to any renewal or extension of contracts.

The Academy will not initiate or approve specifications, evaluations, or orders where a conflict of interest exists. Single tender actions will be subject to independent confirmation.

Undertaking work outside JCA

Members of staff may undertake private work in their own time, but this must not impair the performance of the member of staff's duties nor conflict with the interests of the Academy. Before accepting any work or extending any existing private work, members of staff are encouraged to contact their line manager. Under no circumstances shall stationery (printed or otherwise) bearing the Academy's name, address or letterhead be used in connection with private work.

Gifts, vouchers, points, or payments from suppliers

Gifts, vouchers, or payments received personally by any member of staff from suppliers because of a purchase belonging to the Academy rather than to the person placing the order must be disclosed immediately to the Head of Finance. To avoid doubt, low-value items (below £10) such as calendars, diaries, pens, and mugs may be retained without disclosure. In addition, staff members should disclose to the Head of Finance any preferential prices or discounts offered by suppliers when purchasing goods or services on behalf of the Academy, as these should be announced to other staff responsible for procurement.

Hospitality of a value over £50 received by any member of staff should be disclosed to the Senior Management Team who will inform the Head of Finance. The details will be entered into the Register of Interests.

The Academy values good professional relationships between staff and students. These relationships are heavily reliant upon mutual trust and confidence. The Academy maintains a single comprehensive source of information, as set out by the OfS (E6.2), which sets out policies and procedures on subject matters relating to incidents of harassment and sexual misconduct, including personal relationships between relevant staff members and students.

Members of staff can seek confidential guidance from the HR team. The above list is not exhaustive and may pose a real or perceived conflict of interest. Staff are responsible for using their judgement and, if they doubt, discuss the issue with their line manager and HR.

Relationships between staff and students

JCA maintains a clear policy, in line with sector-wide best practices, regarding relationships between staff and students. The Academy prioritises trust and mutual respect in these relationships while taking steps to ensure that no conflicts of interest arise from personal or intimate relationships.

Staff are expected to declare any potential conflicts arising from relationships with students, and such relationships will be managed in accordance with the Academy's safeguarding and professional code of conduct.

Professional relationships between staff and students are central to the educational experience at JCA. However, personal, intimate, or close relationships between staff and students may give rise to conflicts of interest, perceived favouritism, and imbalances of power, which can undermine trust and integrity within the academic environment. JCA is committed to safeguarding these relationships by establishing clear guidelines and expectations.

Close Personal or Intimate Relationships: Intimate or close personal relationships between staff and students are strongly discouraged, particularly in cases where the staff member has any responsibility for the student's academic progress, welfare, or assessment. Relationships of this nature can lead to perceptions of bias, exploitation, and unfair academic advantage.

If a staff member is in a personal relationship with a student for whom they have any supervisory or pastoral responsibility, the relationship must be disclosed as soon as possible. This disclosure ensures that proper arrangements can be made to mitigate any potential conflicts of interest, including reassigning supervisory roles or excluding the staff member from decisions related to the student's assessment or progress.

Examples of when a staff member would have responsibility for a student include:

- Direct supervision or teaching.
- Responsibility for academic assessments or grading.
- Providing pastoral or welfare support.
- Involvement in the admission or selection process of students.

The Academy recognises that relationships which began prior to the student joining JCA or the staff member assuming their role must still be declared to ensure transparency and proper management. Staff should notify their Head of Department or HR as soon as possible to facilitate a conflict management plan if needed.

Professional Boundaries: In all personal and professional relationships with students, staff must adhere to the highest professional standards. Staff must maintain appropriate boundaries and avoid any behaviour that could be perceived as favouritism or bias. JCA strongly advises staff to communicate with students only through official Academy communication channels and to avoid personal interactions that could blur professional boundaries, such as through social media.

While informal interactions, such as social or extracurricular activities, can be beneficial to the academic environment, staff must always be mindful of their professional responsibilities. Any behaviour that could be perceived as an abuse of power, coercion, or undue influence is unacceptable and may result in disciplinary action

6.Academy Disciplinary Procedures

Failure to follow the guidance set out in this policy will be considered a serious matter and may lead to disciplinary action under the Academy's disciplinary procedures for staff.

Failure to declare a relationship as required by this policy may result in disciplinary action.

Non-disclosure could be considered a breach of the Academy's ethical standards, which may lead to consequences, including dismissal, depending on the severity of the conflict of interest.

7.Record Keeping and Data Protection

All conflicts of interest declared will be recorded in a central Register of Interests maintained by the Governance Office and reviewed annually by the Senior Management Team and the Board of Governors. The Board of Governors shall receive an annual summary of declared conflicts to ensure effective oversight and compliance with the Academy's governance framework.

Any information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 2018 (DPA 2018) and others. Data will be processed only to ensure that members of the Senior Management Team and others within the scope of this policy act in the best interests of JCA. The information provided will not be used for any other purpose.

Accordingly, members of the Senior Management Team are required to declare those

interests that might conflict with their duty of loyalty to the Academy and any gifts or hospitality received in connection with their role in JCA that might conflict with that duty. For the avoidance of doubt, this excludes the receipt of hospitality associated with giving lectures at conferences unless this creates a direct conflict with the Academy.

Declarations will be retained for a minimum of six years in accordance with the Academy's data retention schedule.

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