



**Higher Education Services
Conflict of Interest Policy
(Students and Staff)**

July 2025

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Contents

1.0 Introduction.....	4
2.0 Other Policies to Consider.....	4
3.0 Code of Conduct.....	4
4.0 Reporting a Conflict of Interest.....	5

Higher Education Services Conflict of Interest Policy

1.0 Introduction

1.1 FutureLearn encourages all those engaged with the organisation to participate in a wide range of external activities. Engagements may include those involving community groups, government panels, media commentary, expert advice, outreach to schools and colleges, international assignments, and professional practice. Engagement within the commercial sector may include consulting on research and development or the commercialisation of intellectual property, through licensing arrangements.

1.2 Staff and students involved in these areas may be exposed to conflicts of interests and this policy will guide and monitor potential and actual conflicts of interest. The notion of conflict of interest does not mean misconduct or lack of integrity, however while working or studying with FutureLearn such activities need to be assessed and managed.

1.3 Conflicts of interest must be disclosed regardless of circumstance or perceived conflicts. The activity will be assessed and advised on by the Director of HR (Global University Systems) or Director of Academic Affairs. Where a conflict cannot be managed the activity must cease and not proceed.

2.0 Other Policies to Consider

2.1 When reading this policy, other policy documents that may need to be considered include:

- [Sexual Misconduct, Bullying and Harassment](#)
- [Anti-Bribery and Corruption](#)
- [Research & Ethics](#)
- [Student Terms and Conditions](#)
- [Academic Partnerships and Due Diligence](#)
- [Student Whistleblowing](#)
- [Staff Whistleblowing](#)
- [Gifts, Gratuities and Hospitality](#)
- Brunel University, [Conflict of interest Policy](#)
- Roehampton University, [Conflicts of Interest Policy](#)

3.0 Code of Conduct

3.1 The code of conduct provides guidance to staff and students on when to disclose a conflict of interest. The policy relies heavily on the individual self-reporting and failure to knowingly disclose a conflict of interest will be investigated and could lead to disciplinary measures being taken.

3.2 A conflict of interest is an activity that may create a 'conflict' between the individual's own interests and that of FutureLearn. This could occur if the individual is placed in a compromising position whereby the personal gains could conflict with the interests of FutureLearn. This could include personal gain for a family member, a financial gain, or obligations the individual owes to another. It is advisable for students and staff to consider how the activity will be perceived and to declare such a conflict.

3.3 All students and staff are allowed to study and work within an environment that is open and information on their obligations to FutureLearn are accessible.

3.4 FutureLearn expects all staff and students to behave in a manner that enables them to avoid situations where they may find themselves conflicted.

3.5 Where staff are engaging in research, contracts, or other services they must declare any personal or financial links. Academic staff must seek permission from the Director of Academic Affairs when involving themselves in private consultancy work and keep the Director of Academic Affairs updated on conflicts of interest.

3.6 In line with the UK Bribery Act 2010 staff should not accept or make inducements, direct or indirect monetary rewards for engaging in or refraining from specific activities. In addition, they should not engage in any corrupt behaviour and show favour or disfavour in the management of a contract. Any member of staff involved in shortlisting contractors must declare their personal interest.

3.7 Staff should not allow their intellectual or personal differences to create a conflict with students.

3.8 Staff must ensure any gifts received are placed onto the gift register. If a substantial gift is offered this should be rejected and declared as a conflict of interest.

3.9 It is important that any staff-student relationships are declared in the confidence of the HR department. The Director of HR will convene a meeting with the member of staff to understand the implications of the relationship and how it could impact on the student, staff member and FutureLearn. At no point will the Director of HR probe into the relationship. FutureLearn respects the privacy of staff and students, however, promotes fairness and equality. As such it is important that the HR understands any conflicts arising and works with the staff member to mitigate against any risks by developing a plan to take steps to reduce any conflicts occurring. Once the steps are agreed the Academic Registrar will meet with the student to discuss the situation and agreed outcomes.

- [Sexual Misconduct, Bullying & Harassment Policy](#)

3.10 It is important that any staff relationships are declared in the confidence of the HR. HR will convene a meeting with each of the members of staff to understand the implications of the relationship and how it could impact the working environment within FutureLearn. At no point will HR probe into the relationship. FutureLearn respects the privacy of staff. As such it is important that HR understand any conflicts arising in terms of unfair advantage and confidentiality, and work with the staff members to mitigate against any risks by developing a plan to take steps to reduce any conflicts occurring. HR will work with the department head and the staff on the action plan to ensure there is not an imbalance of power, and any voting rights will be assessed for potential unfair advantages.

- [Sexual Misconduct, Bullying & Harassment Policy](#)

3.11 Any personal relationships within the recruitment and selection process are to be declared to HR as a conflict of interest. HR will assess whether the conflict is sufficient to remove the individual from the process.

4.0 Reporting a Conflict of Interest

4.1 Staff are required to report a conflict of interest at the first possible opportunity. They are to declare it in writing to HR stating the situation, conflicts of interest, and duration of the activity. HR will assess the conflict and may involve other members of management to determine any risks associated with the conflict.

4.2 Associates/contractors are to declare conflicts of interest to HR. HR will assess the conflict and may involve members of management to determine the risks. Any conflict of interest will be recorded, and a record kept on file within the HR department.

4.3 Where a conflict of interest is deemed manageable an action plan will be put in place to record how the activity situation will be managed. This will be kept on record for the period of the activity by the HR department.

4.4 Where the conflict is deemed too much of a risk the member of staff will be asked to cease with the activity with immediate effect.