



## **Conflict of Interest Policy**

### **1. Introduction**

1.1 It is the SEG International college's intent to avoid conflicts between interests of the SEG International College and the personal interests of faculty and staff members. This policy document sets out the definition of conflict of interest adopted by the College, disclosure requirements and management of conflict of interest.

### **2. Definition and Examples**

2.1 A Conflict of Interest arises when someone's personal interests or loyalties could influence, or be seen to influence, the objective performance of their official College duties. The personal interest could be direct or indirect and includes the interests of a Connected Person.

2.2 A Conflict of Interest may arise where an individual might be seen to be influencing College matters for actual or potential personal benefit. Such a conflict may arise in a situation when a member of Staff is in a position to influence, directly or indirectly, College business, research or other decisions in ways that could lead to personal gain or gain for Connected Persons.

2.3 When trying to identify whether there is a Conflict of Interest, consider whether a reasonable person would think your interests and loyalties, including those of a Connected Person, could conflict or appear to conflict with your College duties. Ask yourself:

- Would I be happy if a colleague became aware of my involvement?
- Would I be happy if my involvement appeared in the media?
- If I saw someone else doing this, would I suspect that they might have a Conflict of Interest?

2.4 Staff should not be involved in making decisions in relation to their commitments to the College from which they, or any Connected Person, may stand to benefit. Such considerations apply to a wide range of activities in which conflicts may arise, including, but not limited to:

- student admissions;
- student assessment;
- disciplinary proceedings;
- appeals;
- fee concessions;
- procurement;
- contractual arrangements;

- consultancy;
- licensing intellectual property;
- assessing proposed relationships between the College and outside parties including College Spin Out Companies;
- commencement or development of a College Spin Out Company.

2.5 Any commitments outside of the College should be subject always to the approval of the appropriate person from the college. If there is an actual or potential risk of a perceived conflict arising from such outside interests, this should be disclosed in accordance with the terms of this Policy.

2.6 *Examples:* It is impossible to list all possible Conflict of Interests as circumstances and relationships vary so widely. The following, non-exhaustive list, may be considered as examples of Conflicts of Interest:

- a Staff member is in a position to exert influence on decisions relating to the College in ways that could lead to personal gain or give undue advantage to them or a Connected Person;
- a Staff member has one or more personal interests outside the College which could compromise, or have the appearance of compromising, the Staff member's professional judgement in particular instances within research, administration, management, teaching or other professional activities;
- a Staff member, directly or indirectly, has a personal interest in the outcome of deliberations of a Board or Committee or other such structure, in a contract or proposed contract to be entered into by the College or a related body, or is likely to gain personally as a result of a decision made by the College or a related body;
- a Staff member has any involvement in a company, body or affiliation whether public or private in nature, whose interests may be in competition and/or conflict with those of the College;
- a Staff member accepts gifts, gratuities or favours from any third party engaged in or wishing to engage in transactions with the College, except in the case of customary gifts of a nominal value.

2.7 It is important that in each instance the individual concerned should consider the perspective of an independent external observer and assess if such an observer would perceive there to be a Conflict of Interest.

2.8 In relation to extracurricular commitments that may create conflict, members of Staff should also ensure that they do not enter commitments or engage in activities which are inconsistent with their contracts of employment, with regard to outside activities and the permission required to engage with them. It should be noted that such restrictions may, in some cases, survive the termination of a member of

Staff's employment and as such this Policy is applicable in those circumstances.

### **3. Declaring Conflict of Interest**

- 3.1 All tutors, assessors, internal quality assurers must complete a conflict of interest form on appoint to the College
- 3.2 The form is to be completed even when the individual has no conflict of interest to declare.
- 3.3 The conflict of interest declaration is updated on at least an annual basis by all staff.
- 3.4 The information held on the conflict of interest form is held centrally and monitored by a designated person at the centre.
- 3.5 If the individual concerned has any changes to their declared circumstances, they must inform their supervisor/manager/college administrator immediately in writing.

### **4. Managing Conflict of Interest**

- 4.1 Once a Conflict of Interest has been disclosed, the Director of Curriculum and Quality is responsible for dealing with the Conflict of Interest (and developing a management plan if appropriate) as soon as is reasonably practicable, and in any event within 21 days of the day of the disclosure. An extension to this time frame may be required in certain circumstances and all parties will be advised where this is the case. Until that time, the member of Staff should take no direct part in the particular activity relating to the potential conflict. While the College will strive to agree the management of the Conflict of Interest with the member of Staff, it is accepted that this may not always be possible. In those circumstances, the member of Staff will be directed by the Director of Curriculum and Quality (in consultation with colleagues in the relevant professional area, if required) with regard to the appropriate management. Some Conflicts of Interest will require ongoing management and this should be documented in the management plan. It is recommended that Conflicts of Interest, where ongoing management is required, should be reviewed every three months and the results documented.

### **5. Breach of Policy**

- 5.1 Failure to disclose a Conflict of Interest, or to appropriately refrain from the related activities until the management of the conflict has been resolved, constitutes a breach of this Policy and may result in the College's disciplinary procedures (or equivalent) being activated



## Annex 1: Conflict of Interest Form

### Disclosure (to be completed by staff member)

#### Staff Details

Name: *Click or tap here to enter text.* Position: *In the University*  
Staff Number: Reporting to:  
Date: *If applicable*

#### Potential Conflict of Interest Details

*Enter details of the potential conflict*

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### Management (to be completed by Director of Curriculum and Quality)

#### Type and Category of Conflict

*Please select one type of conflict*

None:  Actual:  Perceived:  Potential:

*Please select one category of conflict*

Academic:  Directorship/ Consultancy:  Research:   
Sale/ Supply/ Purchase:  Spinout/ Startup/ IP:

#### Any Other Relevant Information

*Details*

#### Management Plan

*Describe how the conflict of interest will be managed and monitored. If a follow-up is necessary, please provide details.*

#### Review

Review required:

Type of Review: If review required, enter the steps to be taken during the review

Review date: *Review date*

I acknowledge my agreement and intent to comply with the principles and safeguards of this Conflicts Management Plan.

Signature of staff member

Date

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**SEG  
INTERNATIONAL  
COLLEGE**

Signature of Director of Curriculum and Quality

Date

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