



# CAMBRIDGE MANAGEMENT AND LEADERSHIP SCHOOL

## CONFLICTS OF INTEREST POLICY

### 1. Aim

This document, together with the conflicts of interest policy and conflicts of interest guidelines, set out the Conflicts of Interest policy of Cambridge Management and Leadership School (CMLS).

A conflict of interest is any activity or action undertaken on behalf of the centre and its partner Awarding Bodies, or in a private or other capacity that may impact on the reputation of the centre and any of its Awarding Bodies, by a member of staff or any associate, or any Assessor, Internal Verifier or Internal Quality Assurer used by the centre, which may lead the individual to act contrary to the interests of the Centre or any of its associated awarding Bodies.

### 2. Purpose

- 2.1. This policy seeks to identify that the conflict between the official responsibility of a person in position of trust and any other interests the particular individual may have, where the individual could be seen to be influencing school matters for actual or potential personal benefit, in particular where a faculty member's financial interest may have negative effects on a student's academic interests.
- 2.2. Any action or involvement or interest which may be seen to lead to a conflict of interest should be disclosed where requested and acted upon as appropriate
- 2.3. Aggressive monitoring and conflict management is the key to preventing and resolving conflict situations. It demonstrates good faith on the part of the employee and protects his or her reputation and that of the school.
- 2.4. This policy will not necessarily restrict or preclude an employee's activities. In fact, activities that may at first appear questionable may be deemed acceptable and permissible when all facts regarding the activity are examined.

### **3. Process**

- 3.1. Employees are responsible for disclosing potential conflicts of interest, and/or commitment. Reporting mechanisms for disclosure should begin with the individual's line manager and through them to the Principal or in the case of Professional Services, the appropriate Director.
- 3.2. Consultants to the CMLS are also required to divulge any personal or family financial holdings or situations that could create a conflict of interest and/or introduce bias into their professional judgement. Such disclosures should be made to the CMLS office contracting for the service, and appropriate determination shall be made on the management of any conflict.
- 3.3. Disclosure in all cases shall include the type of potential conflict (conflict of interest or commitment), the nature of the activity, a description of all parties involved, the potential financial interests and rewards, possible violations of legal requirements, and any other information which the employee feels necessary to evaluate the disclosure. The line manager shall advise the Principal of all disclosures. The Principal may also serve as an advisor to staff members who are uncertain regarding the appropriateness of a given activity or management of a given disclosure issue. It is, therefore, incumbent upon the Principal to be familiar with the CMLS policy, and with general legal requirements so as to understand fully the implications of the situation in question. The Principal may need to consult or engage various departments to advice on issues of budget and finance, administration, government relations, and technology transfer, as appropriate. In addition, when presented with a questionable situation, the Principal should reflect on issues to evaluate the nature and acceptability of the situation. Such an evaluation should be supplemented with personal knowledge of institutional policy and government requirements.
- 3.4. After appropriate evaluation, the line manager may find that a proposed or ongoing academic, research or consultancy agreement and the employee's personal interests show no conflict or apparent conflict and are acceptable without further review. Conversely, the line manager may determine that a given situation raises some questions of propriety and requires a higher level of review. For each situation, the line manager shall create a written record of his or her determination that the situation either is acceptable, unacceptable, or requires review at a higher level.
- 3.5. The line below indicates the levels at which review should take place for all staff, with any individual always disclosing to their line manager, and that line manager referring the case to the next higher level of management as appropriate. Member of staff- Line manager- Department Head-CEO and Principal-Board

### **4. Guidelines: Potential Conflicts of Interest**

- Has all relevant information concerning the staff member's activities been acquired (i.e., has there been full disclosure)?
- Do the staff member's relevant financial interests suggest the potential for conflicts or the appearance of conflicts or bias?
- Do the staff member's reported external time commitments exceed permissible levels?
- Is there any indication that the staff member in his or her professional role has improperly favoured any outside entity or appears to have incentive to do so?
- Has the staff member inappropriately represented the CMLS to outside entities?
- Does the staff member appear to be subject to incentives that might lead to conflicts or bias?
- Is there any indication that obligations to the CMLS are not being met?
- Is the staff member involved in a situation that might raise questions of bias, inappropriate use of CMLS assets, or other impropriety?
- Could the staff member's circumstances represent any possible violation of applicable legal requirements?
- Do the current engagements of the staff member represent potential conflicts between outside interests (e.g. working on projects simultaneously for competing business entities)?
- Could the proposed activity withstand public scrutiny?

**CONFLICT OF INTEREST DECLARATION**

*I hereby certify that I have read and understood the Centre Conflict of Interest policy and I accept my accountability and responsibility to report to the CEO/Principal or the Head of Centre any potential conflict of interest which I believe may contravene or act against the interests of this policy.*

Signature:

Name:

Position:

Organisation:

Date: