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## **GBS Conflict of Interest Policy**

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| <b>Policy lead<br/>(Staff member accountable)</b> | CEO   |
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**Related GBS policies**

GBS Data Protection Policy



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- 2.2. It is the responsibility of each individual to recognise situations in which he or she has a conflict of interest, or might reasonably be seen by others to have a conflict, to disclose that to the Chief Executive Officer (CEO) and, to take such further steps as may be appropriate as set out in more detail under the procedure below.
- 2.3. If an individual is uncertain about how this policy might affect his or her activities or has any questions about its application, he or she should contact their line manager.

### **3. Recognising conflict of interest**

- 3.1. A conflict of interest arises where the commitments and obligations owed by an individual member of staff to GBS or to other bodies, for example a funding or awarding body, are likely to be compromised, or may appear to be compromised, by:

that person's personal gain, or gain to immediate family (or a person with whom the person has a close personal relationship), whether financial or otherwise; or

the commitments and obligations that person owes to another person or body.

- 3.2. There can be situations in which the appearance of conflict of interest is present even when no conflict actually exists. Thus, it is important for all staff when evaluating a potential conflict of interest to consider how it might be perceived by others.
- 3.3. The duty to declare a possible conflict applies to the perception of the situation rather than the actual existence of a conflict. However, the duty is not infringed if the situation cannot reasonably be regarded as likely to give rise to a conflict of interest.
- 3.4. Conflicts of interest may be financial or non-financial or both. Further information about both types is set out below.

### **4. Financial conflicts of interest**

- 4.1. A financial conflict of interest, for the purposes of this policy, is one where there is or appears to be opportunity for personal financial gain, financial gain to close relatives or close friends,



or where it might be reasonable for another party to take the view that financial benefits might affect that person's actions.

4.2. Financial interest means anything of monetary value, for example:

payments for goods or services;  
equity interests (e.g. stocks, stock options or other ownership interests);  
resources and assets, including equipment, technical staff and facilities and/or  
intellectual property rights (e.g. patents, copyrights and royalties from such rights).

4.3. The level of financial interest is not the determining factor as to whether a conflict should be disclosed. What might be 'not material' or 'not significant' for one person might be very significant for another. Good practice in many situations will mean the disclosure of 'any' financial interest, however small. A conflict will arise if the interest might provide, or be reasonably seen by others, to provide an incentive to the individual which affects their actions and where he or she has the opportunity to affect a decision or other activity.

## **5. Non-financial conflict of interest**

5.1. Non-financial interests can also come into conflict, or be perceived to come into conflict, with a person's obligations or commitments to GBS or to other bodies, for example the individual's college or other body of which he or she is a trustee. Such non-financial interest may include any benefit or advantage, including, but not limited to, direct or indirect enhancement of an individual's career, education or gain to immediate family.

## **6. Potential Conflict of Interest involving the assessment of a student**

6.1. GBS will take all necessary steps to avoid a conflict of interest where any part of an  
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Students enrolled at GBS are employed in any capacity



## **10. Members of Staff, Assessors and Internal Verifiers**

10.1. Where there is a potential conflict of interest involving members of staff, assessors or internal verifiers, the matter should be referred to the CEO who will ensure that appropriate actions are taken to manage and mitigate any actual conflict of interest including exclusion from further involvement in managing, monitoring, the assessment of students and any financial transaction in any contract in which an interest has been declared.

## **11. Procedure**





11.6. To disclose any conflict of interest, the *Conflict of Interest Declaration Form* must be used (Annex 1).

11.7. Failure to follow the procedure set out in this policy or failure to comply with any stipulated management plan for managing the disclosed conflict will be considered a serious matter and may lead to disciplinary action being taken against the individual.

## 12. Complaints and Grievances

12.1. GBS staff, assessors and internal verifiers may invoke the provisions of the GBS Complaints Policy where there is a grievance regarding any decision made in accordance with the terms of this Policy.

## 13. Monitoring and Review

13.1. This policy may be amended by GBS at any time and will be reviewed every three years to ensure continuing suitability for business needs and compliance with relevant legislation. The policy may be displayed on a notice board. The policy will be available online to all employees on induction and to visitors, contractors, and students on request.

## 14. Data Protection and Confidentiality

14.1. GBS is a data controller, and as such is required to comply with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA). GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).

## 15. Alternative Format

15.1. This policy can be provided in alternative formats (including large print, audio and electronic)



