



Conflict of Interest Policy

Document control

Approved version 1 Feb 20	Author: Head of Administration and QA Reviewed by: Director	First Draft

Application

All **members and students** of **Rushmore Business school**.

Purpose

To ensure that members making decisions on behalf of the Business School disclose and manage any **conflict of interest** they may have, and act in a manner consistent with their responsibilities to the Business School (as the case may be) and the public.

Background

Rushmore Business School encourages their members to have diverse interests and contacts across the local, national and international communities. Collaborations between members and outside bodies are both in the public interest and beneficial to Rushmore.

It is possible however, that a member's interests may at times give rise to an actual, potential or perceived conflict of interest with their role and responsibilities at the school.

Ensuring that conflicts of interest are properly managed is crucial to reducing legal and reputational risk and demonstrating the integrity of individual members and of the school. Conflicts of interest that are not properly managed have the potential to damage the reputation of individual members, integrity and of the school.

Policy

Principles

The guiding principles for the identification and management of conflicts of interest in any situation are:

1. Members acting on behalf of the Business School must always be seen to behave in an impartial and transparent manner
2. It is important to understand that the existence of a conflict of interest does not necessarily imply wrong doing on the part of any person. However, any interests which could give rise to a conflict of interest must be disclosed

3. Members need to be alert to situations in which they, or the people that they manage or supervise, may have a conflict of interest and ensure that the situation is recognised and handled appropriately

4. Conflicts of interest must be dealt with quickly and transparently, that is they must be:

- acknowledged
- disclosed
- put on record, where appropriate, and
- effectively managed or avoided

5. If a member has any doubt as to whether a conflict of interest exists, they must disclose the matter to their Head of Department or the Director.

6. Members must consider how an impartial observer might reasonably perceive a conflict of interest situation or **relationship**, whether any wrongdoing is involved

7. Conflicts of interest may raise complex issues and members and their Head of Department must judge each situation that arises in a prudent manner

8. Disclosure of conflicts of interest may involve disclosing personal information. This information must be handled with due regard to the privacy of the individual concerned

9. If a person has a conflict of interest in the matter being considered, they must not take part in any discussion or decision on the matter giving rise to the conflict unless the chair / relevant manager decides otherwise

10. However, a person who has a direct or indirect financial interest in the matter being considered must not take part in any decision about the matter

Identification and effective management of conflicts of interest

11. Members must identify and disclose any actual or potential conflict of interest that may affect, or may be seen to affect, their impartiality when acting on behalf of the Business School

12. Each conflict of interest situation must be dealt with as soon as reasonably practicable after it is identified

13. Conflicts of interest must be disclosed to the appropriate person in the circumstances. The HR Department is responsible to ensure all disclosures are recorded and put in staff file, while for student, a disclosure duly filled in form is kept in student's file as a record.

The appropriate person in most circumstances will be the member's immediate Head of Department, or in the case of committees, the chair

14. The situation must then be reviewed, managed and recorded by the relevant Head of Department or chair in a manner that is appropriate to the circumstances

15. Head of Departments across the Rushmore must help to build awareness of conflict of interest situations, and support those who report to them to comply with their obligations under this policy

Register of interests

16. All conflicts of interest and relevant Head of Department responses are to be submitted for inclusion in the relevant conflicts of interest register maintained for the School by the HR Department / Student Support Services.