



## **Conflict of Interest Policy**

### **1. Purpose and Scope**

The purpose of this policy is to provide a clear and proportionate framework for the identification, declaration and management of conflicts of interest within IBS. The policy supports effective governance, professional management and regulatory compliance, and is intended to protect both individuals and the College from actual, potential or perceived conflicts that could compromise decision-making or institutional integrity.

This policy applies to all staff of IBS. Senior post-holders are required to complete an annual Declaration of Interests and to be recorded on the College's Register of Interests. All staff are required to declare conflicts of interest as they arise.

### **2. Introduction**

IBS is committed to upholding high standards of governance, transparency and accountability. The College expects all staff to exercise independent judgement and to act at all times in the best interests of the institution.

Conflicts of interest that are not appropriately identified and managed may expose the College and individuals to reputational, legal, financial or regulatory risk. Where conflicts are identified early and managed effectively, individuals are generally able to continue their duties without detriment, while safeguarding the integrity of institutional decision-making.

### **3. Definition of a Conflict of Interest**

A conflict of interest arises where an individual's personal, financial, family or other external interests could, or could reasonably be perceived to, influence their professional judgement, decision-making or performance of duties on behalf of IBS.

Conflicts may be actual, potential or perceived. A perceived conflict exists where a reasonable and informed third party might conclude that an individual's objectivity could be compromised, even if this is not the case.

## **4. Policy Statement**

All staff of IBS are responsible for:

- identifying circumstances in which an actual, potential or perceived conflict of interest exists or may arise;
- declaring such circumstances promptly in accordance with this policy; and
- cooperating with any agreed measures put in place to manage or mitigate the conflict.

Senior staff, by virtue of their roles and responsibilities, are required to complete an annual Declaration of Interests, even where no conflicts exist.

Failure to declare a conflict of interest, or to comply with agreed management arrangements, may result in investigation and action under the College's disciplinary procedures.

## **5. Recognising Potential Conflicts of Interest**

Staff are responsible for remaining alert to situations that may give rise to conflicts of interest. Conflicts may be financial or non-financial in nature.

Interests that may require declaration include, but are not limited to:

- directorships or significant shareholdings;
- trusteeships or advisory roles;
- board or committee appointments;
- honorary positions;
- receipt of gifts or hospitality; and
- close personal relationships that intersect with professional responsibilities.

Where there is uncertainty as to whether a circumstance constitutes a conflict, staff should seek advice and make a declaration in accordance with this policy.

## **6. Register of Interests**

IBS maintains a Register of Interests, which records declared actual or potential conflicts and the measures agreed to manage them. The Register supports transparency and provides assurance to the College's governing bodies.

Senior staff are required to complete a Declaration of Interests annually. All staff must declare conflicts as soon as they arise, regardless of their role.

## **7. Managing Conflicts of Interest**

Where a conflict of interest is identified, the individual must disclose the matter using the Declaration of Interests Form and discuss it with the Chief Executive Officer or Chief Operating Officer, as appropriate.

Following disclosure, one of the following outcomes will apply:

- the disclosure is noted and no further action is required at that time; or
- additional controls or mitigation measures are agreed to manage the conflict effectively.

Any agreed actions will be recorded on the Register of Interests. Where circumstances change, the status of a declared conflict will be reviewed and updated accordingly.

## **8. Examples of Potential Conflicts of Interest**

Examples of conflicts of interest may include, but are not limited to:

- employment, consultancy or governance roles in organisations that may have dealings with IBS;
- ownership or financial interests in businesses that may transact with the College;
- personal or family relationships that intersect with admissions, assessment, disciplinary or procurement decisions;
- involvement in external education providers or awarding bodies that may give rise to competing interests; and
- ownership or interest in property leased to, or located near, the College.

These examples are illustrative and not exhaustive.

## **9. Seeking Advice**

Staff who are uncertain about whether a situation constitutes a conflict of interest are encouraged to seek advice from the Chief Executive Officer or Chief Operating Officer. All discussions and disclosures will be handled sensitively and in confidence.

## **10. Related Policies and Documents**

This policy should be read in conjunction with the following IBS documents:

- Declaration of Interests Form
- Register of Interests
- Staff Disciplinary Policy and Procedure
- Fit and Proper Persons Policy
- Whistleblowing (Public Interest Disclosure) Policy