



UKMC Conflict of Interest Policy

Date	Author	Summary of Changes	Version	Authorised
6 May 2025	Head of HR	Initial publication to ensure transparency, fairness, and consistency in the selection process.	1.0	Academic Board
11 May 2025	Head of HR	Amendments to update the policy	1.1	Academic Board May 2025
07/08/2026	Compliance Manager	Update 2.2 adding potential and perceived COI, Sec 3.1 added requirement to withdrawer from discussion, Sec 5 & 6 Improve record keeping and extend stakeholders to 'any' acting on behalf of UKMC.	1.2	Compliance Department 11/08/2026 Academic Board TBC
Policy/Procedure Management and Responsibilities				
Policy/Procedure Owner	The policy is overseen by the Head of Quality and Compliance and will be approved by academic board. Significant governance matters arising from conflicts of interest may also be reported through internal governance channels. Day-to-day implementation and communication responsibilities are delegated to relevant stakeholders across HR, Heads of Quality and Compliance, and Executive Board.			
Equality Impact / Analysis	Quality and Compliance Department			
Effective From	Aug 2026			
Next Review	Dec 2028			
Internal/External	Both			
Document Location	Internal HE Staff Portal UKMC Policies and Legislation			
Linked Documents	Internal HE Staff Portal UKMC Policies and Legislation			
Dissemination Plan	Public availability on the UKMC website. Training for awareness, and inclusion of references in key documents or agreements as appropriate.			
Accessibility	Alternative formats on request. Email Quality@ukmc.ac.uk			

Supporting Statement

This document should be read in conjunction with the following statements:

Equality and Human Rights

UK Management College recognises that some sections of society experience prejudice and discrimination. The Equality Act 2010 specifically recognises the *protected characteristics* of age, disability, sex, race, religion and belief (or lack thereof), sexual orientation, gender reassignment, pregnancy and maternity and marital and civil partnership status. UKMC also recognises wider socio-economic disadvantage when promoting equality of opportunity.

The college is committed to promoting and advancing equality and removing and reducing discrimination and harassment and fostering good relations between people that hold a protected characteristic and those that do not both in the provision of services and in our role as a major employer. The college believes that all people have the right to be treated with dignity and respect and is committed to the elimination of unfair and unlawful discriminatory practices.

UK Management College also is aware of its legal duties under the Human Rights Act 1998. Section 6 of the Human Rights Act requires all public authorities to uphold and promote Human Rights in everything they do. It is unlawful for a public authority to perform any act which contravenes the Human Rights Act.

UK Management College is committed to carrying out its functions and service delivery in line with a Human Rights based approach and the FREDA principles of **F**airness, **R**espect, **E**quality **D**ignity, and **A**utonomy

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1. Purpose

1.1 The relationship of the organisation and its employees and/or representatives of UKMC, is based on mutual trust. This policy sets out what actions should be taken in the event of a conflict of interest.

2. Definition

- 2.1. In general, an employee should refrain from allowing their personal and/or financial activities from coming into opposition with the interests and integrity of the organisation and thus placing it at a disadvantage. This also include members of governance bodies, contractors and volunteers.
- 2.2. Where this does happen is known as a conflict of interest. All actual, potential or perceived conflicts of interest must be declared as soon as they arise and recorded in accordance with UKMC procedures.
- 2.3. Conflicts of interest between an organisation and its employees can arise in many circumstances and it is not possible to provide a single definition. If, however, an employee is aware of a conflict of interest, they, as a matter of urgency, should raise the issue with their immediate manager so that corrective action may be taken before actual damage is done.

3. Types of Interests that must be declared

- 3.1. An example of a conflict of interest may be where an employee has a family member who uses the service.
- 3.2. Financial interests
 - 3.2.1. Paid external work, consultancy, or advisory roles
 - 3.2.2. Self-employed work, especially in the Education and recruitment sector
 - 3.2.3. Shareholdings, sponsorships, gifts, or hospitality
 - 3.2.4. Financial benefits that may come from referring students to recruitment or admission at UKMC
- 3.3. Personal or family relationships
 - 3.3.1. Relationships with applicants
 - 3.3.2. Relationships with contractors, or colleagues where influence could arise, or impact effective governance.
- 3.4. External roles or commitments
 - 3.4.1. Directorships, trusteeships, or roles with external organisations
- 3.5. Academic or research-related interests
 - 3.5.1. External Research funding, sponsorship, supervision, assessment, or collaboration that could affect impartiality
- 3.6. **Example** It is common practice for academic to seek External Examiner roles. Although if External examining for the same institution or partner institutions is good governance to declare that you work at both institutions.

4. Resolution

- 4.1. The organisation will attempt to resolve any conflicts of interest as fairly and as reasonably as possible. Where a conflict of interest exists, the individual may be required to withdraw from discussions, decision-making processes, recruitment activities, procurement exercises, academic decisions or other relevant activities.
- 4.2. One way this may be done (but not limited to this action) is by ensuring that the conflicting person of interest is dealt with by another employee, and not their family member.
- 4.3. If no resolution can be found, the final action to be taken will rest with senior management. If a conflict of interest is deliberately concealed by an employee or if no solution to one can be found, the organisation may invoke disciplinary action that could lead to the employee's dismissal, and/or legal action depending on the degree of omission or reputational damage.

5. Breaches

- 5.1. Breaches of UKMC's code of conduct are likely to be regarded as an act of misconduct to be addressed under the disciplinary procedure.
- 5.2. Some of the above sections indicate the level of offence that could occur if breaches are found.

6. Scope

- 6.1. This policy applies to all colleagues broadly including employees, governors, executive board members, contractors and volunteers. Including members of the Academic Board, committees and any individual acting on behalf of UKMC.
- 6.2. Declarations of interest for Board of Directors members are completed through the UKMC - Conflicts of Interest Policy and Declaration (Board of Directors) internally.

7. Duties & Responsibilities

- 7.1. UKMC will maintain a Register of Interests for relevant staff, governors and committee members. Individuals are responsible for ensuring their declared interests remain accurate and up to date.
- 7.2. The Human Resources Department have embedded the Declaration of Interest form into the Employee onboarding and as such new employees will

be expected to complete this honestly and truthfully as part of the appointment to post.

8. Dissemination

- 8.1. This policy will be brought to the attention of all employees and will form part of the induction process for new staff.
- 8.2. This policy will be disseminated organisation wide for all employees to understand and be made aware of via awareness presentations and the Staff intranet system 'Employment Hero'.
- 8.3. It is important that staff understand and are aware of this policy.

9. Document Review

- 9.1. This policy will be reviewed annually, or sooner in response to regulatory, legislative or organisational changes.
- 9.2. Policy updates will be reported to the Academic Board for consideration.