



## 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
<b>Policy/Procedure Management and Responsibilities</b>				
Policy/Procedure Owner	The policy is overseen by the Head of HR and approved by academic board. Day-to-day implementation and communication responsibilities are delegated to relevant stakeholders across HR, Heads of Department, and Senior Leadership.			
Equality Impact / Analysis	EDI Committee TBD			
Authorised By	Academic Board (May 2025)			
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Version	1.1			
Internal/External	Both			
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Linked Documents	Internal HE Staff Portal <a href="#">UKMC   Policies and Legislation</a>			
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 <a href="mailto:Quality@ukmc.ac.uk">Quality@ukmc.ac.uk</a>			

## 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. The Equality Act also requires regard to socio-economic factors.

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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## Purpose And Rationale

- 1.1.1. 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.

## Definition

- 1.1.2. 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.
- 1.1.3. Where this does happen is known as a conflict of interest. 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.
- 1.1.4. An example of a conflict of interest may be where an employee has a family member who uses the service.

## Resolution

- 1.1.5. The organisation will attempt to resolve any conflicts of interest as fairly and as reasonably as possible.
- 1.1.6. 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.
- 1.1.7. 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.

## Breaches

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

## **Scope**

- 2.1.1. This policy applies to all colleagues including employees, governors, executive board members, contractors and volunteers and anyone else engaged to carry out duties within the organisation's premises on behalf of the organisation will be covered.

## **Duties & Responsibilities**

- 2.1.2. The responsibility for resolving any conflict of interest lies with the immediate manager - although it may later involve senior management.

## **Monitoring & Dissemination**

- 2.1.3. The Human Resources Department will maintain data to enable monitoring of this policy.

## **Dissemination Of The Policy**

- 2.1.4. This policy will be brought to the attention of all employees and will form part of the induction process for new staff.
- 2.1.5. This policy will be disseminated organisation wide for all employees to understand and be made aware of via awareness presentations, newsletters and emails.
- 2.1.6. It is important that staff understand and are aware of this policy.

## **Review Of The Policy**

- 2.1.7. There will be a review of the policy on a three-yearly basis, or sooner if appropriate e.g., as a result of legislation changes requirements.
- 2.1.8. Policy updates will be reported to the Academic Board for consideration.