

IBCM Conflict of Interest Policy

1.0 Purpose

IBCM is committed to maintaining the highest standards of integrity, transparency and accountability in its governance and operations.

The purpose of this policy is to:

- Protect the integrity of decision-making.
- Ensure that decisions are made solely in the best interests of IBCM and its students.
- Promote public confidence in IBCM's governance and management.
- Comply with regulatory requirements, including those of the Office for Students (OfS).
- Ensure actual, potential and perceived conflicts of interest are identified, declared and appropriately managed.

2.0 Scope

2.1 This policy applies to:

- Members of the Governing Body.
- Members of committees and advisory groups.
- Senior postholders and members of the Senior Leadership Team.
- Employees.
- Consultants and contractors acting on behalf of IBCM.
- Any individual participating in decision-making processes on behalf of IBCM.

3.0 Definition of a Conflict of Interest

3.1 A conflict of interest arises where an individual's personal, professional, financial or other interests could influence, or be perceived to influence, their judgement, decisions or actions on behalf of IBCM.

3.2 A conflict may be:

Actual Conflict

A direct conflict currently exists between an individual's interests and those of IBCM.

Potential Conflict

A conflict could arise in the future due to circumstances or relationships.

Perceived Conflict

A reasonable person could conclude that an individual's judgement may be influenced, even if no actual conflict exists.

3.3 All three forms of conflict must be disclosed and managed appropriately.

4.0 Examples of Conflict of Interest

4.1 Examples include, but are not limited to:

Financial Interests

- Ownership of, or investment in, a supplier or partner organisation.
- Financial interests in companies contracting with IBCM.
- Receiving gifts, hospitality or benefits from organisations dealing with IBCM.

Employment and Business Interests

- Secondary employment that may compete with or influence IBCM activities.
- Directorships, trusteeships or advisory positions with external organisations.
- Consultancy work involving organisations connected to IBCM.

Personal Relationships

- Family members employed by IBCM.
- Family members applying for employment, contracts or admission.
- Close personal relationships that may affect recruitment, assessment or procurement decisions.

Academic and Regulatory Matters

- Involvement in decisions affecting programmes, partnerships or institutions with which the individual has an association.
- Participation in quality assurance or validation decisions involving connected organisations.

Procurement and Contracting

- Participation in purchasing decisions involving organisations with which the individual has a connection.
- Receipt of commissions, incentives or personal benefits arising from contracts.

5.0 Principles

5.1 Individuals must:

- Act in the best interests of IBCM and its students.
- Be open and transparent regarding personal interests.
- Avoid situations that could compromise impartiality.
- Declare interests promptly.
- Cooperate with measures introduced to manage conflicts.

5.2 The existence of a conflict does not necessarily prevent involvement with IBCM; however, it must be appropriately managed.

6.0 Register of Interests

6.1 IBCM shall maintain a Register of Interests.

The register will record:

- Employment and professional appointments.
- Directorships and trusteeships.
- Shareholdings and significant financial interests.
- Close family relationships relevant to IBCM activities.
- Significant consultancy arrangements.
- Other interests considered relevant.

The register shall be:

- Updated annually.
- Updated whenever circumstances change.
- Reviewed by the Governance Clerk/Secretary and Chair of the Governing Body.
- Available for inspection by authorised persons.

6.2 A summary register for governors and senior postholders may be published where appropriate.

7.0 Declaration of Interests

7.1 Individuals must declare conflicts:

- On appointment.
- Annually through the Register of Interests process.
- At the beginning of meetings.
- Immediately when a new conflict arises.

7.2 Declarations must include sufficient information to allow appropriate assessment and management.

8.0 Managing Conflicts of Interests

8.1 Where a conflict exists, the Chair, Committee Chair, Principal or designated officer shall determine appropriate action.

Management actions may include:

- Recording the conflict.
- Restricting access to information.
- Excluding the individual from discussions.
- Excluding the individual from decision-making.
- Requiring the individual to leave part of a meeting.
- Independent review of decisions.
- Withdrawal from a role where the conflict cannot be effectively managed.

8.2 The chosen approach shall be proportionate to the nature and significance of the conflict.

9.0 Governing Body and Committee Meetings

9.1 At the start of each meeting:

- Members shall declare any interests relating to agenda items.
- The declaration shall be recorded in the minutes.
- The Chair shall determine whether participation is appropriate.

9.2 Where a significant conflict exists, the member shall normally:

- Withdraw from discussion.
- Not receive confidential papers relating to the matter.
- Not participate in voting.

9.3 The minutes shall record the action taken.

9.4 Where the Chair has a conflict, another independent member shall assume responsibility for managing the matter.

10.0 Recruitment and Employment

10.1 Individuals involved in recruitment, promotion, appraisal, disciplinary matters or assessment must declare any personal relationship or other interest that could influence the process.

10.2 Appropriate safeguards may include:

- Alternative decision-makers.
- Independent oversight.
- Removal from the process.

10.3 No individual shall supervise or make sole decisions regarding a close family member.

11.0 Procurement and Financial Decisions

11.1 Individuals involved in procurement, contracting or expenditure approvals must declare any interests relating to suppliers, contractors or partners.

11.2 No individual shall:

- Participate in supplier selection where a conflict exists.
- Influence procurement decisions for personal benefit.
- Authorise payments connected to their own interests.

11.3 All procurement decisions must be demonstrably fair, transparent and value for money.

12.0 Gifts and Hospitality

12.1 Employees and governors must not accept gifts, hospitality or benefits that could influence, or reasonably be perceived to influence, decision-making.

12.2 Modest hospitality associated with legitimate business activity may be accepted where appropriate.

12.3 Cash gifts must never be accepted.

13.0 Failure to Declare Interests

13.1 Failure to disclose a conflict of interest may constitute misconduct and may result in:

- Disciplinary action.
- Removal from committees or governance roles.
- Termination of appointment or employment where appropriate.

13.2 Serious breaches may be reported to relevant regulators or authorities.

14.0 Monitoring and Review

The Board of Governors shall oversee implementation of this policy and receive periodic reports on:

- Register of Interests compliance.
- Significant conflicts identified.
- Actions taken to manage conflicts.
- Emerging governance risks.

15.0 Responsibilities

15.1 Governing Body

The Governing Body is responsible for:

- Ensuring appropriate conflict management arrangements exist.
- Promoting transparency and accountability.
- Reviewing significant conflict issues.

15.2 Chair of the Governing Body

The Chair is responsible for:

- Managing conflicts at Governing Body meetings.
- Ensuring declarations are recorded.
- Promoting compliance with this policy.

15.3 Managers and Committee Chairs

Managers and Chairs are responsible for:

- Identifying potential conflicts.
- Taking appropriate management action.
- Escalating significant concerns where necessary.

15.4 All Staff and Governors

All individuals are responsible for:

- Declaring relevant interests promptly.
- Cooperating with conflict management arrangements.
- Acting in the best interests of IBCM.

16.0 Related Policies

This policy should be read alongside:

- Code of Conduct.
- Whistleblowing Policy.
- Fraud, Bribery and Anti-Corruption Policy.
- Financial Regulations.
- Governance Framework.

17.0 Version History

Version	1.0
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