

Conflicts of Interest Policy

Stay Campus London International College (SCL) places a high degree of trust in the professional standards of its employees. Nonetheless, we remain vigilant at all times toward conflicts of interest that may arise and all disclosures are subject to thorough internal investigation. This scrutiny ensures that the ethical standards which underpin our institution's working practices are never breached and safeguards our reputation as an educational provider of integrity.

Our Conflicts of Interest Policy has been developed to protect staff members from discrediting themselves and the wider organisation through acts of professional misconduct that might be avoided by promoting awareness of the types of conflict that are likely to arise and by establishing a culture of open and honest disclosure.

This Conflicts of Interest Policy, therefore, should not be construed as embodying a lack of trust toward SCL employees. To the contrary, it is hoped that this Policy will be effective in protecting the institution and its staff against criticism or self-compromise by helping them to identify conflict situations as they arise, enabling employees to make timely disclosures so that the institution may take swift and appropriate steps to manage and mitigate them.

SCL's Conflicts of Interest Policy advocates a three-pronged approach:

- **Awareness and Avoidance**

Anticipate and actively avoid situations where you may face competing interests that risk impacting your impartiality or testing your loyalty to SCL.

Avoid situations where you may be seen to benefit, directly or indirectly, or allow a third party to benefit, from the decisions you make.

- **Disclosure**

You are duty-bound to report potential conflicts of interest to your superior as soon as you become aware of them. If in doubt as to whether a specific situation might constitute a perceived or actual conflict of interest, you should voice your concerns to your immediate superior as first port of call.

- **Manage the Conflict**

Following a disclosure, SCL will take immediate action to mitigate any damage caused by actual or perceived conflicts of interest. You should be aware that activities deemed to directly jeopardise or violate the public interest or the interests of the institution may be prohibited.

Conflicts of Interest: a Broad Definition

Conflicts of interest can arise from a variety of circumstances and no single definition can possibly cover the myriad situations the term encompasses. The following is therefore intended as a broad definition that may prove useful to our purposes, but is by no means exhaustive in its scope.

A conflict of interest occurs when our private interests, such as external relationships or financial gain, interfere—or appear to interfere—with the interests of the wider organisation, preventing us from fulfilling our duties impartially.

Our professional decisions must not be based on needs originating from outside Stay Campus London, and we have a duty to avoid even the appearance of a conflict between our personal interests and those of SCL. We are expected to arrange our private affairs so that in our professional lives we can put our loyalty to SCL before all other considerations. It follows that as individual we must never act, or indeed *appear* to be acting, in a way that influences SCL matters for actual or potential personal benefit, or seeking such a gain at the expense of the institution.

It is of significance that the definition above not only speaks to cases in which an individual explicitly betrays the trust placed in them by SCL to complete their duties, but also to equally detrimental instances whereby a conflict may merely *appear* to exist. It is consequently of the gravest importance that members of staff disclose any potential conflict of interest in full and without hesitation to their superior at the earliest possible opportunity. Disclosure will result in SCL taking immediate steps to prevent further escalation in line with the best-practices outlined in this Policy and in the following Guidelines which exemplify some common situations that can give rise to conflicts of interest.

Conflicts of Interest Guidelines

Summary of Conflicts of Interest Policy

SCL Governors and the Board of Managers adhere to the seven principles of public life, as recommended by the Nolan Committee's report Standards in Public Life, which are identified as:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

This Policy is not intended to call into question the integrity or professionalism of SCL academic staff members, but rather to provide clear guidance that will allow them to engage in external activities securely whilst at the same time safeguarding the reputation of the wider institution and the integrity of its employees, and preventing instances of corporate liability.

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Conflicts of Interest: an Introduction

These days, academic staff commonly perform a range of activities outside of their primary academic institution, some of which may take the form of collaborations of a broadly commercial nature. SCL acknowledges the many benefits these outside experiences can yield, such as the introduction of new technologies, insights into emergent business innovations and common practices, and a broader understanding of current societal needs.

At the same time, staff members' external commercial ventures may on occasion pose a risk to the fulfilment of their mission of service to SCL. A conflict of interest may arise due to the external venture putting excessive demands on an employee's time or attention, thereby impeding completion of their SCL duties. A scenario such as this may attract suspicion that decisions and actions taken by members of SCL's academic team are not being conducted with the due level of rigour. Accusations may even be raised that a perceived neglect of duties is driven by personal financial interest. Moreover, the commercial objectives of an employee's external venture may run counter to SCL's mission, vision, values, primary objectives or principles of governance or, in more extreme cases, the employee may be in danger of appearing to be in competition with SCL through their involvement in an external commercial venture. While SCL recognises the integrity and high professional standards of its academic staff at all times and accepts that such allegations are often baseless, it is nonetheless of paramount importance that employees actively avoid situations and activities that could give rise to perceived conflicts of interest such as these.

SCL actively encourages its employees to cultivate external interests, however academic staff are required under their contract of employment to ensure that external consultancy roles do not exceed more than 28 days per annum and that any external commitments undertaken comply with the institution's Conflict of Interest Policy and Guidelines.

In most cases, all that is required to absolve an employee of any suspicion is the simple disclosure of any external activity that could represent a conflict of interest. To this end, all employees must submit a Register of Interests declaration at the beginning of each academic year so that SCL can better manage any perceived or actual conflicts of interest and prevent them from occurring. SCL may on occasion propose an alternative means of managing an external activity to ensure that a conflict of interests does not occur. In the unlikely event that an external activity or the accumulation of several external commitments poses a serious conflict of interest whose risk cannot be mitigated through good time- and task-management practices, SCL may have to consider restricting one or other of an employee's conflicting activities.

These Guidelines supplement the Conflict of Interests Regulations and offer practical guidance to SCL employees on how to manage any perceived or actual conflicts of interest. The Guidelines seek to identify common situations that may give rise to conflicts of interest so that SCL employees may be better equipped to recognise potential issues before they occur in order to make a timely disclosure them to their superior. The examples given in these Guidelines are intended as an indicative sample and are by no means a definitive list. If you have doubts or questions regarding the impact of this Policy on the performance of your external activities, your superior will be happy to discuss them with you further. If, after having sought their guidance, you do not feel your doubts or questions have been addressed, please refer them to the Principal. Please be aware that you are still required to declare an actual or perceived conflict of interest through submission of the Register of Interests even if you have discussed it at length with a superior.

Some Examples of Conflicts of Interest

Conflicts of interest can be categorised in three broad types:

- financial
- non-financial
- both financial and non-financial

Examples of Financial Conflicts of Interest

These may pertain to any of the following:

- pay
- commission
- consultancy fees
- equity interests
- debt forgiveness
- substantial property
- royalties
- intellectual property rights

Examples of Non-financial Conflicts of Interest

These may include benefits or advantages pertaining to any of the following:

- career enhancement
- education or professional reputation
- access to privileged information
- access to facilities

Conflicts of interest may arise when you, members of your family or people with whom you have close relationships are involved in:

- **business positions** (including Executive or non-Executive Directorships, partnerships, ancillary employment in other businesses)
- **appointments** (including trustees in charitable organisations, school governors, appointments with a funding body or external examination board)
- **consultancy** (including external commercial research and development roles)

- **investments** (including shareholdings or spin-out companies, beneficial interests in trusts)
- **gifts** (including reportable gifts such as substantial travel or hospitality)
- **other personal interests** which could constitute a potential conflict of interest situation

This list is by no means comprehensive and many other situations could feasibly give rise to a potential conflict of interest.

By contrast, interests relating to your personal and professional identity, including personal beliefs and interests such as education, profession, reputation, and career advancement do not constitute conflicts of interest.

Conflicts of Interest Guidelines

The key message in this policy is that if you have any reason to believe that an activity may constitute a conflict of interest, you should always disclose it to a superior. These Guidelines describe the way in which preemptive disclosures should be reported (prior to a staff member engaging in an activity that could give rise to a conflict), and through the annual submission of the Register of Interests at the beginning of the academic year.

Conflicts of Commitment versus Conflicts of Interest

Conflicts of interest occur when the professional decisions or actions of an employee who holds a position of trust are compromised by considerations of their own personal or financial gain, or by considerations of attaining similar gains for friends, family members or other external parties that may hold influence over them.

Most disclosures of potential conflicts of interest amount simply to a case of conflict of commitment. These may occur when an employee's external commitments interfere with the fulfilment of their mission of service to SCL, making excessive demands on their time or attention. Conflicts of commitment can often be managed through careful time-management and disciplined working practices. However, financial remuneration from these external activities poses the risk of conflicts of commitment developing into full-blown conflicts of interest.

Categories of Conflict of Interest

Educational Mission Conflicts

The principal duty of all academic staff is to provide education that directly addresses students' learning needs. Students' research must be driven by their own learning objectives in line with the required course outcomes and cannot be directed in any way by the financial or personal motives of tutors, trainers or academic managers. External teaching conducted by SCL tutors and trainers must in no way conflict with their academic duties at SCL.

Financial Interest Conflicts

The conduct of academic staff must never compromise SCL's financial interests. Employees must ensure that SCL is fairly remunerated for any work performed externally that benefits from its intellectual property such as teaching and learning resources or research papers, as well as any other assets, equipment, facilities, staff, etc.

Loyalty and Commitment Conflicts

With regard to approved external roles such as consultancy, positions on advisory boards, committees, trusteeships, directorships and partnerships, the loyalty and commitment of academic employees is expected to remain, in the first instance, with SCL. Staff are expected to ensure that their duties stemming from their secondary external commitments do not create conflict with fulfilment of their primary duties as an employee of SCL. If in any doubt as to whether an external appointment risks giving rise to a conflict of loyalty, staff members should disclose their concern to their superior without delay. Disclosures from tutors and trainers should be addressed to their academic manager, while academic managers should report conflict of interest concerns to the Principal.

Conflicts of Interest Regulations

Disclosure

Staff are expected to make a disclosure as soon as they have identified an activity or commitment, that risks giving rise to a potential conflict; more specifically, at the precise moment that they recognise that a conflict of interest could be perceived. Sufficient detail must be disclosed to allow the reviewer to assess the level of risk posed by the potential conflict and make informed decisions that will lead, if necessary, to appropriate counteractions. Details will be recorded in the institution's Conflicts of Interest Register.

Upon disclosure, the situation will be monitored scrupulously in order to manage and mitigate the conflict for the benefit of both SCL and the discloser. The process of disclosing an activity or commitment that raises a potential conflict does not mean that SCL will automatically delimit or forbid it. In many instances, activities initially suspected of representing a conflict are found to be completely admissible following closer examination.

Process

Disclosures by employees and consultants must include the following information:

- category of conflict [conflict of interest or conflict of commitment]
- description of the activity
- complete list of all persons, companies, committees or other organisations involved
- list of financial interests and rewards
- potential legal implications
- other information relevant to assessing the disclosure

Disclosures made by tutors and trainers should be addressed to their academic manager while disclosures made by academic managers should be addressed to the Principal. Similarly, academic managers should report conflict of interest concerns regarding staff under their supervision to the Principal.

Before commencing work with the institution, consultants employed by SCL must declare any potential conflicts of interest that might affect the partiality of their decision-making. Disclosures should be addressed to the Principal and must list relevant financial holdings, including those pertaining to family members.

In any instances where a disclosure has not been made directly to the Principal, a report is to be logged by the end of the subsequent business day with notification sent to the Principal by email. A copy of the disclosure report will also be kept in the employee's HR file.

Reports must clearly state the outcome of the disclosure assessment, which will fall into one of four categories:

- Full approval granted without need to monitor the situation or investigate further
- Approval granted under the proviso that the situation remains under constant review
- Approval denied owing to one or more activities constituting a conflict of interest. Restrictions on one or more activities would need to be imposed by the Principal for approval to be granted.
- Approval suspended pending authorisation from a superior or guidance from an external department e.g. finance, HR, legal, etc.

If in doubt as to whether a given disclosure can be granted approval or requires further monitoring or intervention, academic managers should seek guidance from the Principal. In turn, the Principal may be required to consult with the Finance Manager, legal or HR departments before an evaluation can be made. In cases where a financial holding, consultancy role, or ongoing external appointment are not deemed to represent a conflict of any consequence, commencement or recommencement of employment may be granted with immediate effect.

Disclosure Assessment

The appendices to these Regulations include a list of considerations designed to provide assessors of conflict disclosures with a framework of criteria to assist them in the evaluation and approval process. While these considerations can be applied to a wide range of conflict scenarios, assessors should aim to apply them in concert with self-developed criteria pertinent to the specific circumstances of individual cases.

The considerations in [Appendix I](#) are intended to help determine whether an employee's external activities, relationships, commitments, interests, etc, warrant legitimate cause for concern.

The considerations in [Appendix II](#) are intended to help determine whether adequate controls can be established to mitigate conflicts to an appropriate degree.

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- [Appendix I](#)
Considerations for determining situations that represent a conflict of interest
- [Appendix II](#)
Considerations for determining if conflict of interest situations can be mitigated

Appendix I

CONSIDERATIONS FOR DETERMINING SITUATIONS THAT REPRESENT A CONFLICT OF INTEREST

1. Does the disclosure contain sufficiently detailed information to make an informed assessment?
2. Is there any evidence that the employee has financial interests that could influence their impartiality or loyalty and constitute an actual or perceived conflict of interest?
3. Is there any evidence that the time demands of external appointments could be likely to create conflict with fulfilment of the employee's mission of service to SCL?
4. Is there any evidence that the employee has ties of a preferential nature to external organisations?
5. Is there any evidence that the employee has misrepresented SCL to external third parties?
6. Is there any evidence that the employee's impartiality or loyalty could be jeopardised by incentives originating outside the organisation?
7. Is there any evidence that the employee's duties at SCL are not being fulfilled?
8. Is there any evidence that the employee has acted with partiality, misappropriated SCL funds or misused SCL assets?
9. Is there any evidence that the employee's situation or conduct might constitute a breach of the law?
10. Is there any evidence that the interests of the employee's external appointment may compete or oppose the interests of SCL?
11. Would the external appointment stand up to public scrutiny?

Appendix II

CONSIDERATIONS FOR DETERMINING IF CONFLICT OF INTEREST SITUATIONS CAN BE MITIGATED

1. Is there a disinterested and impartial staff member available to monitor and manage the conflict?
2. Will an independent peer review be carried out prior to the publication of any research papers?
3. What mechanisms are in place to prevent bias in external research projects? For example, is the research project double-blind? Are research subjects selected at random? Will the project be supervised by an impartial third-party?
4. Will the sponsor and/or relevant parties receive acknowledgement? When research is publicly presented, will sponsors be acknowledged?