

Conflicts of Interest Policy

1. Purpose and Scope

This policy offers guidance to all staff, faculty, and stakeholders of SCL International College concerning the identification, disclosure, and management of real, potential, or perceived conflicts of interest. The objective is to assure transparency and fairness, particularly in the domains of English language courses and level 3 pathways, encompassing International Foundation Programmes.

2. Definition

Conflict of Interest: A scenario in which an individual's personal, familial, or financial interests might conflict or seem to challenge their professional judgement and allegiance to their duties at the college.

3. Types of Conflicts of Interest

- a. **Personal Interest:** Potential personal gains from decisions one can influence within the college.
- b. **Familial Interest:** Potential benefits for family members or close associates due to one's actions or decisions.
- c. **Professional Interest:** Opportunities for professional progression or gains through certain actions or decisions.
- d. **Business Interest:** A stake in a business that might profit from one's decisions at the college.
- e. **Academic Interest:** The capacity to sway academic results for personal advantage or the benefit of someone close.

4. Principles

Reality of Conflicts: Conflicts of interest, whether perceived, potential, or actual, are a commonality in the work environment.

Recognition is Key: The onus is on individuals to identify and understand conflicts or situations that might be seen as conflicting by others.

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Self-Management: Most conflicts are minor, posing a low risk, and can be personally managed by the individual.

Declaration and Treatment: Major conflicts, due to their higher risk and potential for direct influence, necessitate formal declarations and coordinated management strategies with line managers.

Non-declaration Consequences: Intentional failure to disclose significant conflicts in a timely manner is viewed seriously.

5. Whistleblowing on Conflicts of Interest

If an individual believes there exists a conflict of interest involving those above them in the company hierarchy, including line managers or directors, they have the right to raise concerns through the established whistleblowing procedures. Whistleblowing is a crucial mechanism to ensure accountability and transparency within the institution, especially when standard channels may not be adequate. All whistleblowing reports are treated with utmost confidentiality, and the individual raising the concern is protected from any form of retaliation or reprisal.

6. Identification and Disclosure

Proactive Recognition: Staff and faculty should actively disclose any real, potential, or perceived conflicts to their immediate supervisor or department head.

Annual Declaration: Annually, all staff and faculty will declare known conflicts.

Emergent Conflicts: Any unexpected conflict arising during the year should be promptly disclosed.

7. Management and Mitigation

Upon disclosure:

Evaluation: The appropriate authority assesses the conflict's potential impact.

Strategising: An action plan is formed to oversee the conflict, safeguarding the college's integrity.

Reduction or Reassignment: High-risk conflicts may lead to a reassignment of duties or responsibilities.

Monitoring: Conflicts are periodically reassessed to ensure proper management.

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8. Examples of Conflicts

Relevant examples include:

A faculty member with a personal relationship to an applicant influencing admissions.

An employee benefiting from a business serving as a college supplier.

A close personal connection between an evaluator and student.

9. Non-Compliance Consequences

Undisclosed conflicts or policy breaches may result in disciplinary actions, as defined by SCL International College's HR guidelines. Measures range from counselling sessions to potential employment termination.

10. Training

Regular training will be provided to ensure a universal understanding of conflict recognition and management.

11. Policy Review

This policy will be reviewed annually to ensure its relevance and to make any necessary updates.

Last Reviewed: May 2023 by Paul Clarke and Gary Speirs

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