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GBS Conflict of Interest Policy

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Related GBS policies
<ul style="list-style-type: none"> ▪ GBS Data Protection Policy ▪ GBS Equality and Diversity Policy ▪ GBS Staff Disciplinary Policy
External Reference Points
<ol style="list-style-type: none"> 1. Information Commissioner's Office, Accessed online at: https://ico.org.uk/ 2. UK Public General Acts, <i>Data Protection Act 2018</i>, Accessed online at: https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted

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Global Banking School Conflict of Interest Policy

1. Policy Statement

- 1.1. Global Banking School (GBS) encourages members of its staff to engage in a wide variety of external activities. The traditional academic roles, such as teaching and supervising students are often supplemented by commercial collaborations including consultancy, commercial research and development, intellectual property licensing and involvement in companies.
- 1.2. GBS recognises that involvement in such external activities carries many advantages to the institution and the individuals concerned. However, on occasion, they may give rise to conflicts of interest, whether *potential* or *actual*, *perceived* or *alleged*.
- 1.3. Therefore, all GBS staff are required to recognise and disclose activities that might give rise to conflicts of interest or the perception of conflicts and to ensure that such conflicts are seen to be properly managed or avoided.
- 1.4. If properly managed, activities can usually proceed as normal whilst at the same time upholding the person's obligations to GBS, meeting regulatory and other external requirements and protecting the integrity and reputation of GBS and its members. By contrast, conflicts which are not managed effectively may jeopardise GBS' public standing and may cause serious damage to the reputation of GBS and of the individuals concerned.
- 1.5. It is therefore GBS policy to encourage and foster external activities whilst ensuring that when conflicts or perceived conflicts of interest arise, they are identified and disclosed, and in relevant cases, appropriately managed. In every instance, GBS reserves the right to make a determination in light of its best interest.

2. Scope

- 2.1. This policy applies to all members of GBS, including staff, external committee members, consultants, honorary appointments and volunteers. A reference in this policy to staff includes any person within the scope of the policy.

- 2.2. It is the responsibility of each individual to recognise situations in which he or she has a conflict of interest, or might reasonably be seen by others to have a conflict, to disclose that conflict to the individual's line manager and through them to the Chief Executive Officer (CEO) and, to take such further steps as may be appropriate as set out in more detail under the procedure below.
- 2.3. If an individual is uncertain about how this policy might affect his or her activities or has any questions about its application, he or she should contact their line manager.

3. Recognising conflict of interest

- 3.1. A conflict of interest arises where the commitments and obligations owed by an individual member of staff to GBS or to other bodies, for example a funding or awarding body, are likely to be compromised, or may appear to be compromised, by:
- that person's personal gain, or gain to immediate family (or a person with whom the person has a close personal relationship), whether financial or otherwise; or
 - the commitments and obligations that person owes to another person or body.
- 3.2. There can be situations in which the appearance of conflict of interest is present even when no conflict actually exists. Thus, it is important for all staff when evaluating a potential conflict of interest to consider how it might be perceived by others.
- 3.3. The duty to declare a possible conflict applies to the perception of the situation as well as to the actual existence of a conflict. The policy recognises that assessing perception involves judgement. A possible conflict of interests does not need to be declared if it is judged that it is unlikely to cause a conflict of interest. If a person is uncertain in this judgement the matter should be discussed with a line manager, project lead, committee chair or other appropriate person.
- 3.4. Conflicts of interest may be financial, non-financial or both. Further information about both types is set out below.

4. Financial conflicts of interest

- 4.1. A financial conflict of interest, for the purposes of this policy, is one where there is, or appears to be, opportunity for personal financial gain, financial gain to close relatives or close friends, or where it might be reasonable for another party to take the view that financial benefits might affect that person's actions.
- 4.2. Financial interest means anything of monetary value, for example:
- payments for goods or services;
 - equity interests (e.g. stocks, stock options or other ownership interests);
 - resources and assets, including equipment, technical staff and facilities and/or
 - intellectual property rights (e.g. patents, copyrights and royalties from such rights).
- 4.3. The level of financial interest is not the determining factor as to whether a conflict should be disclosed. What might be 'not material' or 'not significant' for one person might be very significant for another. Good practice in many situations will mean the disclosure of 'any' financial interest, however small. A conflict will arise if the interest might provide, or be reasonably seen by others, to provide an incentive to the individual which affects their actions and where he or she has the opportunity to affect a decision or other activity.

5. Non-financial conflict of interest

- 5.1. Non-financial interests can also create a conflict of interest, or be perceived to cause a conflict of interest. A person may have obligations or commitments to GBS or to other bodies, for example the individual's role in or responsibilities to a college or other body of which he or she is a trustee. Such non-financial interest may include any benefit or advantage, including, but not limited to, direct or indirect enhancement of an individual's career, education or gain to immediate family. There is a potential conflict of interest only if these activities are conducted for organisations that may present such a conflict.

6. Potential Conflict of Interest involving the assessment of a student

- 6.1. GBS will take all necessary steps to avoid a conflict of interest where any part of an assessment of a student (including by way of moderation) is undertaken by a person who has a personal interest in the outcome of that assessment.

6.2. A potential conflict of interest may arise where:

- Friends or relatives of GBS staff or managers are enrolled as students at GBS.
- Friends or relatives of Assessors / Internal Verifiers used by GBS are enrolled as students at GBS.
- Students enrolled at GBS are employed in any capacity.

7. Corporate Governance

7.1. The Governance Office will oversee an annual exercise to request/update declarations of interest from the Board of Directors and senior managers in GBS and GEDU with significant influence on decisions with the potential for conflicts of interest (e.g. the senior management team and key financial managers). This will be recorded in a register of interests and presented to a Board of Directors meeting for review annually. Where new conflicts of interests arise in-year, these will be recorded by the Secretary and noted at the next meeting. Where there is a potential conflict of interest involving a Board member, the Board will decide whether the declared conflict of Interest will preclude the Committee member from all or part of the meeting.

7.2. Where there is a potential conflict of interest involving a Committee member, the Committee member will declare this to the Chair of the Committee(s) of which they are a member, either during a Committee meeting or in advance. The Chair of the Committee will decide whether the declared Conflict of Interest will preclude the Committee member from all or part of the meeting. The CEO will also be notified in writing by the committee secretary or equivalent.

7.3. All decisions where a conflict of interest arises will be recorded by the secretary of the relevant committee/board and reported in the minutes of the meeting setting out:

- The nature and extent of the conflict of interest.
- An outline of the discussion.

- The actions taken to manage and mitigate the effects of the conflict of interest, including whether the Committee member was excluded from the whole meeting or just relevant items.

8. Members of Staff, Assessors and Internal Verifiers

- 8.1. Where there is a potential conflict of interest involving members of staff, assessors or internal verifiers, the matter should be referred to the CEO who will ensure that appropriate actions are taken to manage and mitigate any actual conflict of interest including exclusion from further involvement in managing, monitoring, the assessment of students and any financial transaction in any contract in which an interest has been declared.

9. Procedure for Declaration of Interest of Members of Staff (not covered in section 7)

- 9.1. It is the duty of every member of staff to accurately and promptly disclose:
- a change in status of an existing actual, perceived or potential conflict of interest and/or commitment.
 - a new actual, perceived, or potential conflict of interest and/or commitment.
- 9.2. Apparent or perceived conflicts of interest can be as damaging as actual conflicts of interest. Staff should consult their line manager if they are uncertain about whether a situation or activity presents a conflict of interest. The line manager shall evaluate the activity or situation and advise on the most appropriate course of action.
- 9.3. The general rule, with the exception of committee business, is that disclosure should be made at the time the conflict first arises, or it is recognised that a conflict might be perceived, in writing to the line manager. If the line manager has an interest in the matter to be discussed, the disclosure shall be made to the person at the next higher level of authority.
- 9.4. Disclosure in all cases shall include the type of potential conflict, the nature of the activity, a description of all parties involved, the potential financial interests and rewards, possible violations of legal requirements, and any other information which the employee feels necessary to evaluate the disclosure.

- 9.5. External committee members (not including those covered in 7.1.) to GBS are also required to divulge any conflict of interest and/or connection that could bias into their professional judgement. Where relevant, such disclosures should be made to either the CEO or the GBS's Board of Directors (whichever is commissioning the work involved) and appropriate determination shall be made on the management of any conflict.
- 9.6. To allow GBS to evaluate any conflict of interest, the *Conflict of Interest Declaration Form* must be used (Annex 1). Completed forms will be evaluated by either the CEO or the GBS Board of Directors (whichever is commissioning the work involved).
- 9.7. Failure to follow the procedure set out in this policy or failure to comply with any stipulated management plan for managing the disclosed conflict will be considered a serious matter and may lead to disciplinary action being taken against the individual.

10. Complaints and Grievances

- 10.1. GBS staff, assessors and internal verifiers may invoke the provisions of the GBS Complaints Policy where there is a grievance regarding any decision made in accordance with the terms of this Policy.

11. Monitoring and Review

- 11.1. This policy may be amended by GBS at any time and will be reviewed every three years to ensure continuing suitability for business needs and compliance with relevant legislation. The policy may be displayed on a notice board. The policy will be available online to all employees on induction and to visitors, contractors, and students on request.

12. Data Protection and Confidentiality

- 12.1. GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the [Information Commissioners website](#). GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).

- 12.2. The information provided will be processed in accordance with the relevant data protection principles and this information will only be disclosed when GBS is in receipt of a formal, legitimate request.

13. Alternative Format

- 13.1. This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact the Governance Office at governance@globalbanking.ac.uk

Annex 1 – GBS REGISTER OF INTEREST DECLARATION FORM

Please fully complete Section A and Section B. State N/A if not applicable.

Section A: Personal and/or financial interests of trustee/employee/agent/officer/member

To the best of my knowledge and belief, I have the following connections of the kinds set out under the following headings:

Q1. Employment
Please provide details of any / all y remunerated appointments/roles which you hold.
Q2. Directorships
Please provide details of any / all Directorships which you hold. Please provide company registration number(s) where applicable.
Q3. Shareholdings
Please provide details of any / all significant shareholdings you hold, amounting to one percent (or greater) of the share issue; in a public company or a private company or body.
Q4. Political Interests
Please provide details of any political interests which are a matter of public record, for example, election to a local political office.
Q5. Connections to Government departments
Please provide details of any connections you hold, whether paid, unpaid and/or advisory, with government departments.
Q6. Connections to other Higher Education (HE) institutions or funding bodies
Please provide details of any connections you have to HE institutions or funding bodies. It is not necessary to register appointments as external examiners with other HE institutions.
Q7. Charities
Please provide details of any positions you hold as a trustee of any charities. Include positions that are paid, unpaid and/or advisory. Please provide charity registration number(s) where applicable.
If you are a council or committee member then all trusteeships must be given.
Q8. Personal relationships
Please provide details of any personal relationships you have within GBS UK or other organisations working with GBS UK.
Q9. Connections to other organisations
Please provide details of any specific connections, whether paid, unpaid and/or advisory, with other organisations.
Q10. Other Factors
Please provide details of any other factors, such as posts (paid, unpaid and/or advisory), honorary positions or other connections you have.

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Section B: Personal and/or financial interests of spouse/partner/cohabitee and immediate family members

To the best of my knowledge and belief my spouse/partner/cohabitee and immediate family members (parents, siblings and children) have the following connections of the kinds set out under the following headings. Please ensure the name of the relevant individual, and their relationship to you, is listed:

Q11. Employment
Please provide details of any / all remunerated appointments roles held by your spouse/partner/cohabitee and members of your immediate family.
Q12. Directorships
Please provide details of any / all Directorships held by your spouse/partner/cohabitee and members of your immediate family. Please provide company registration number if required.
Q13. Shareholdings
Please provide any details of any significant shareholdings held by your spouse/partner/cohabitee and members of your immediate family, amounting to one percent (or greater) of the share issue; in a public company or a private company or body.
Q14. Personal relationships
Please provide details of any personal relationships with employees/officers of GBS UK or any organisation working with GBS UK held by your spouse/partner/cohabitee and/or members of your immediate family.
Q15. Connections to other organisations
Please provide details of any specific connections, paid, unpaid and/or advisory, with other organisations, held by your spouse/partner/cohabitee and members of your immediate family.

General declaration

I have declared in Sections A and B all activities and connections which may present a conflict between my private interests and my duty to Global Banking School (GBS). I declare that to the best of my knowledge and belief the answers I have given are truthful, accurate and complete. There are no other activities or personal relationships that may present a conflict between my private interests and my duty to GBS. I understand that it is my responsibility to discuss and review this declaration with the CEO; and to update this declaration. I undertake to inform the CEO/ GBS Board of Directors (depending on who is commissioning the work involved) of any change to these answers within ten working days of becoming aware of them.

Name

Signature

Date

Please submit this completed form to the CEO or the governance team according to who is communicating with you regarding the work or role under consideration