

Conflict of Interest

Policy



Document Overview

Title:	Conflict of Interest Policy		
Document Number:	CMBS_Coi-PP_006	Document Type:	Policy

Version History

Version No.	Date	Description of Changes
V1	Sept24	Initial document creation

Continuous Improvement

Policies, procedures and processes are meant to be 'living' documents that need to be followed, implemented and maintained. If the procedure does not reflect the current, correct work practice please contact us on quality@cmbs.edu.mt

Ensure you are reading the latest version available on the CMBS LMS.

Table of Contents

-----	1
1. Conflict of Interest Policy-----	3
1.1 Scope and Applicability	3
1.2 Purpose	3
2. Definitions -----	4
3. Process-----	5
3.1 Identifying Conflicts of Interest	5
3.2 Disclosing a Conflict of Interest	5
3.3 Resolving Conflicts of Interest	6
3.4 Enforcement and Compliance	6
3.5 Record Keeping	6
4. Associated Policies -----	6

1. Conflict of Interest Policy

1.1 Scope and Applicability

This policy is applicable to all stakeholders of the Central Mediterranean Business School (CMBS), including students, faculty, staff, CMBS approved learning centres and external partners. It governs all professional, academic, and administrative activities, both on and off campus, ensuring that personal interests do not compromise ethical standards or the integrity of the institution.

1.2 Purpose

The purpose of this policy is to maintain the integrity and reputation of CMBS by ensuring that all stakeholders act in the best interests of the institution. It aims to prevent personal interests from compromising professional judgment and actions, thereby fostering an environment of trust, accountability, and ethical conduct.

2. Definitions

Conflict of Interest	Occurs when an individual's or CMBS approved centres personal interests could improperly influence the performance of their professional duties or decisions, potentially conflicting with the interests of CMBS.
Disclosure:	The act of making known any personal interests that might interfere with one's professional responsibilities.
Reviewer:	A person responsible for evaluating disclosed conflicts of interest and determining the appropriate action or resolution. Depending on the circumstance the reviewer may be the Head of School, the Quality Committee, Foreign awarding body or the local authorities.
Stakeholders	CMBS Stakeholders include but are not limited to: Staff, Faculty, Students, Suppliers, CMBS approved Learning Centres and Partners.

3. Process

3.1 Identifying Conflicts of Interest

Stakeholders must evaluate their personal, commercial, or financial interests to determine if they may conflict with their duties at CMBS or an CMBS approved Centre. If unsure, stakeholders should assume a conflict exists and disclose it. Similarly, if a conflict is observed but not disclosed by the involved party, it should be brought to their attention.

A conflict of interest may arise under circumstances where an individual's external interests could impact their professional obligations and duties towards CMBS. Conflicts of interest may be:

- **Direct:** Where personal gains are immediately derived from decisions or actions taken in an official capacity.
- **Indirect:** For example, where an associate or family member stands to gain from the individual's position or decisions within CMBS.

Upon disclosure, the Reviewer will assess and decide the appropriate action to mitigate the conflict, ensuring that decisions are made in the best interests of CMBS. The management strategies might include, but are not limited to, abstention from decision-making processes, delegation of decision-making authority, or full divestiture of conflicting interests.

3.2 Disclosing a Conflict of Interest

All employees and associated persons are required to disclose any situations that reasonably could be expected to give rise to a conflict of interest. This disclosure should be to the immediate manager, School Principal, CEO, Quality Committee, CMBS approved centre or Foreign Awarding bodies (if appropriate), as soon as the individual becomes aware of the potential conflict. Disclosure should be made in writing, detailing the nature of the conflict and the parties involved. This allows the Reviewer to make an informed decision on the conflict's management.

3.3 Resolving Conflicts of Interest

- The Reviewer will determine if a conflict exists and work with the stakeholder to find a reasonable resolution.
- Pending resolution, the stakeholder must refrain from any decision-making related to the conflict.
- Resolutions might include modification of the stakeholder's involvement, third-party oversight, or cessation of the conflicting activity.

3.4 Enforcement and Compliance

Non-compliance with this policy can lead to disciplinary measures, which may include reprimands, suspension, or termination of employment or association with CMBS, depending on the severity of the breach.

3.5 Record Keeping

Records related to conflicts of interest, including disclosures, management actions, and outcomes, will be maintained confidentially by the School Principal to ensure compliance with this policy and to provide an audit trail for accountability and transparency.

4. Associated Policies

- CMBS Ethos
- Code of Ethics
- Code of Academic Integrity Policy
- Programme and Academic Regulations
- Grievances and Appeals Policy and Procedure
- Malpractice and Maladministration Policy and Procedure
- Student Rights, Responsibilities and Code of Conduct Policy
- Assessment and Internal Verification Policy and Procedure
- Assessment of Dissertations Policy and Procedure
- Student Life Cycle Policy and Procedures