



## LMA Conflict of Interest Policy

(updated August 2018)

### 1.0 Introduction

LMA is a highly respected provider of FE and HE programmes in the North West of England.

LMA has adopted a policy to address conflicts of interest to ensure that its activities, and those of its staff and students, are, and are seen to be, conducted to the highest standards of ethics and integrity.

As an institution in receipt of public and other funds LMA has a duty to fulfil the highest standards of corporate governance. During the course of their duties members of staff may be involved in making transactions or entering into commitments or contracts on behalf of the College or they may simply be spending College money. It is very important therefore that if a member of staff has a private interest, financial or otherwise, which could overlap with their duties as an employee of the College then this interest must be disclosed and managed appropriately.

1.1 The existence of an explicit conflict of interest policy is not in any way intended to question the integrity of College staff; LMA encourages staff to engage in appropriate external activities but it is necessary to have mechanisms to protect staff and the College from reputational damage or other liabilities. By engaging in such external activities, employees may place themselves in a difficult position in which an outside interest may conflict, or appear to conflict, with their College duties. The employee may then be open to suspicion that decisions they take as a LMA employee are influenced by personal financial interest even when the employee is acting with neutrality and complete professional integrity.

1.1 In order for LMA and its employees to maintain the highest standards of integrity and reputation, it is essential that all employees declare any interest that they, or members of their family, may have that could give the appearance of a conflict, even where no actual conflict exists.

### 2.0 Purpose

The purpose of this policy is to provide guidance to relevant individuals when conducting their duties as an employee of LMA involving any external individual or organisations. This policy applies to all staff whenever they have contact with any individual or organisation external to the College.

This policy defines:

- What is meant by conflict of interest.
- Sets out the roles and responsibilities for managing conflict of interest.

### **3.0 Scope**

- The policy covers the whole of LMA.
- The individuals falling within scope of this policy include governors, senior leaders, business support and academic staff.

All staff are governed by their contractual commitments which outline the following:

*You are required to devote your full time, attention and abilities to your duties during your working hours and to act in the best interests of the Corporation at all times. Accordingly, you must not, without the written consent of the Corporation, undertake any employment or engagement that might interfere with the performance of your duties or conflict with the interests of the Corporation.*

*It follows that, regardless of whether you are employed on a full-time or a part-time contract, you are required to notify the Principal of any employment or engagement which you intend to undertake whilst in the employment of the Corporation (including any such employment or engagement which commenced before your employment under this contract). The Principal will then notify you within 10 working days whether such employment or engagement is prohibited.*

### **4.0 Definition**

A working definition of a conflict of interest is:

*'a conflict between the private interests and the official responsibilities of a person in a position of trust'*

- 4.1 The definition is not restricted to cases where the individual actually betrays this trust it can be equally damaging for the conflict of interest to exist or to appear to exist or even have the

potential to develop into an actual or perceived conflict of interest. This policy is a mechanism for protecting LMA employees against criticism or compromise by ensuring that they recognise and disclose such conflict situations and take steps to avoid and manage them.

## **5.0 Roles and Responsibilities**

All relevant staff and other individuals have a responsibility to be aware of the potential for a conflict of interest. It is likely that individuals working closely with external individuals and/or organisations will encounter potential conflicts of interest from time to time.

Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact on the standards of, or public confidence in, LMA. All conflicts of Interest must be disclosed as outlined in your contract of employment.