

## Conflict of Interest Policy

### 1.0 Purpose

The purpose of this policy is to protect the interests of Regent College London (RCL). In the regular course of business, agents and employees may have the opportunity to advance their own personal interests with or against the interests of the RCL. Acting in such a manner is unacceptable and any party who acts outside of the RCL's best interests may be subject to disciplinary action.

### 2.0 Definitions

A. Employee: any person who is employed by RCL in a part or full-time capacity and in accordance with the labour laws of state

B. Agent: an owner, director, stakeholder, contractor, or other third-party that is in the position to act on behalf of the RCL

C. Financial Interest: The interest that any individual may have in the monetary transactions of RCL. In particular, any interest that could have a direct bearing on the financial gain / loss of the said individual.

### 3.0 Procedure

#### 3.1 Duty To Disclose

Every employee / agent of the RCL is obligated to disclose any known or potential conflicts of interest as soon as they arise. Failure to do so could result in termination of employment.

#### 3.2 Investigating potential conflicts

When a possible conflict of interest arises, the Board of Directors will collect all the pertinent information and may question any concerned parties. If the board determines that a conflict exists, steps will be taken to address the conflict. If no conflict exists, the inquiry may be documented but no further action will be taken.

#### 3.3 Addressing Conflict of interest

When an actual conflict of interest is found, any transactions that may have been affected will be reviewed retroactively. Affected parties both within and outside of the RCL, including shareholders, directors and employees, will be notified. An investigation will also be conducted by the board to determine the extent of the conflict and the intentions of the parties involved.

#### 3.4 Disciplinary Action

As all conflicts of interest will be reviewed on a case-by-case basis, a review may result in disciplinary action. The Board of Directors has full discretion to deem what disciplinary action is both fitting and necessary, including suspension and / or termination of employment.

## 4.0 Guidelines

All employees are expected to act with honesty and integrity, and to work in the best interests of the RCL. No external, personal or financial interests shall lead to compromise in performing the duties and responsibilities.

All employees must declare, at the time of joining, the names of their friends and family members who are employed in the RCL.

All conflicts that arise during the term of employment, irrespective of the nature, level and impact, must be reported to the management via email within 24 hours of identification.

Employees holding key positions and handling bank accounts on behalf of the RCL are obligated to declare their interests that could create conflicts.

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment.

Any behaviour that constitutes a potential crime may be referred to law enforcement agencies.

We resolve to act promptly to identify, manage and mitigate conflicts, and protect the integrity of the RCL. Best practices will be put in place for declaration of conflicts. Any breaches of this policy will be investigated with confidentiality, transparency and professionalism.

## 5.0 Monitoring

The Service Quality Review Team who will monitor the implementation of this policy include:

Staff Members Involved

Senior Management Team

Staff

## 6.0 Review

This Policy would be reviewed annually by the Management. It may also be reviewed in the case of any substantial change, whichever is earlier.

For advice and support contact the Head of Centre.

## Policy Information

Purpose	Policy Information
Title	Conflict Of Interest Policy
Document Number	0169/93
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Audience	Staff
Category	Compliance
Next review date	March, 2026

## Version Control

Version	Author	Amended by	Date	Comments
1.01	DoS	DGS	18/3/2024	Policy approved by RCL Governance Committee
2.01	AH	QAC	18/3/2025	Policy approved by RCL Quality Assurance Committee