



Numeration: HR05-16-02-POL

Date: 1 September 2019

Released By: Dean

Conflict of Interest Policy

Version	Approved by	Approval date	Effective date	Modifications
1.0	Dean	15 August 2019	15 August 2019	New Policy
2.0	Dean	1 September 2019	1 September 2019	Revision

1. Preamble

1.1 The SSBM has an expectation of all staff members to act at all times in the course of their SSBM employment in a manner consistent with high standards of integrity in accordance with the SSBM's values. This includes taking actions to disclose and manage any actual, potential or perceived conflicts of interests to ensure appropriate transparency and ethical behaviour in the conduct of SSBM business.

1.2 The SSBM acknowledges that conflicts of interest may arise in a range of SSBM activities, including research, assessment, staffing, administration and commercial activity. However, it is essential that such conflicts are disclosed and appropriately managed when they do arise.

2. Purpose and Scope

2.1 This policy aims to define staff responsibilities with respect to disclosing and managing conflicts of interest and to direct staff to information to assist them to meet the SSBM's requirements relating to conflicts of interest.

2.2 This policy applies to all staff of the SSBM, including academic status holders. External members of SSBM (e.g., Advisory Board) are not included in the scope of this policy. Separate processes exist for recording disclosures from external SSBM members, and all members should comply with the provisions in the relevant section of the Faculty/Student Handbook.

2.3 In the case of individuals engaged as independent contractors to provide services to the SSBM, contract provisions relating to conflict of interest must be observed.

2.4 In cases where additional requirements relating to conflicts of interest apply, for example requirements of some external funding bodies or specific professions, SSBM staff members must also comply with such requirements, in addition to the provisions included in this policy.

3. Definitions

Benefit: anything that provides either a direct or indirect personal gain, or the potential for a personal gain, which may be either financial or non-financial.

Close personal relationship includes a relationship with a spouse, including de facto partner, a relative, a person financially dependent on the staff member, a close friend, or any person with whom there is or has been an intimate or close relationship.

Conflict of interest arises when a staff member's personal, external or financial interests, or the interests of someone with whom the staff member has a close personal relationship, are in conflict with the staff member's professional obligation to the SSBM. A conflict could lead to either a benefit or detriment (financial or non-financial) occurring if a matter were to be determined in a particular way. A conflict may be actual, potential or perceived.

Staff member: refers to all academic and professional staff of the SSBM, including academic status holders.

4. Responsibilities

4.1 All staff members must disclose and record on the SSBM's Register any actual, potential or perceived conflicts of interest as soon as they become aware of any such conflict.

4.2 Supervisors, in consultation with the staff member, must determine the appropriate approach to a disclosed actual, potential or perceived conflict of interest and record this on the Register.

4.3 In the case of staff membership of committees or other decision-making bodies, any actual, potential or perceived conflicts of interest that relate to the committee's business must be disclosed to the committee and recorded in the minutes or notes of the relevant meeting. The staff member must follow the direction of the chairperson who has responsibility for the management of the conflict that has been disclosed. In cases where the Chairperson makes a disclosure, the management of the conflict will be determined by a resolution of the members, and this must be recorded in the meeting minutes or notes.

5. Gifts and benefits

5.1 A staff member must not accept any gift or benefit (including hospitality) in the course of their SSBM employment if such acceptance is likely to create an actual or perceived expectation of favourable treatment. If unsure about the probity of accepting a gift or benefit, the staff member should decline it or seek the advice of their supervisor.

5.2 The following provisions apply to the acceptance of gifts or benefits (including hospitality):

- Gifts or benefits under CHF150 in value do not require approval or disclosure to be accepted, although if the staff member wishes to disclose acceptance in the interests of transparency, they may do so using the Register.
- Gifts or benefits that are CHF150 and over in value must be disclosed on the Register and require supervisor approval for acceptance.
- Where the staff member is uncertain as to whether the value of the gift or benefit is under CHF150 they should make a disclosure on the Register and seek their supervisor's approval to accept the gift to ensure transparency.

5.3 Notwithstanding the provisions set out above, staff must not:

- solicit any gift or benefit from any individual or organisation in connection with their SSBM employment;
- accept cash (or equivalent) as a gift in any circumstance;
- accept gifts or benefits from a potential supplier during a procurement process if the staff member is directly or indirectly in a position to influence the outcome of that process; or
- accept a gift from a student or their family if such acceptance is likely to create an actual or perceived expectation of favourable treatment.

6. Breaches of policy

6.1 Non-compliance with a responsibility imposed under this policy may be taken to be misconduct.

6.2 All SSBM staff members are required to comply with all relevant corruption laws and bylaws which imposes obligations to report matters that are reasonably suspected to involve corruption, misconduct or maladministration. Non-compliance with conflict of interest requirements may result in a matter being reported in accordance with this legislative requirement.