



UK

Conflict of interest policy and procedure

Location	Oxford Campus, c/o Activate Learning, Jericho Building, Oxford OX1 1SA
Monitoring	The Principal, the Office Manager, the Board of Directors
Overall responsibility	Board of Directors
Created	August 2025
Next review date	August 2026 or as necessary

1. Definition /Introduction

A conflict of interest exists when the duties of an individual towards EM Normandie UK Ltd conflict with, may potentially conflict with or could be perceived to conflict with, a personal, financial or other interest or external duty that the individual holds and/or, through the interests of someone who has a close personal connection to this individual.

The existence of a conflict of interest is therefore not determined by whether the individual is in fact influenced in their duties or decisions. A conflict of interest exists when an interest could reasonably be perceived as affecting, or having the capacity to affect, an individual's ability to make impartial decisions on the company's behalf.

Conflicts may arise from activities in relation to admissions and recruitment, teaching/supervision, research, examination, awarding of qualifications, HR, membership of committees (particularly for external members), procurement, commercial transactions, contractor selection, Quality Assurance, and others.

2. Conflicts of interest can be financial or non-financial

- Financial conflicts can arise where there is or appears to be an opportunity for personal financial gain to an individual, or financial gain to someone with a close personal connection to the individual or where it might be reasonable for another party to take the view that financial benefits might affect that individual's actions.

Examples include payments, benefits in kind, equity interests, gifts, hospitality or intellectual property rights.

- Non-financial interests may include any direct or indirect benefit or advantage, enhancement of an individual's career or education, or gain to a person connected to this individual.

3. Scope

This policy applies to all directors of the company, all members of staff and all consultants, external members of Boards and Committees, other service providers and anybody else acting for or on behalf of EM Normandie UK Ltd.

4. Principles

EM Normandie UK Ltd (hereafter 'EMN' or 'the school') expects all individuals and groups to whom this policy applies to carry out their duties , at all times with

- Integrity
- transparency
- selflessness
- accountability
- openness
- honesty
- objectivity
- impartiality

Any conflict of interest whether real, potential or perceived, that is not managed appropriately could severely impact EMN's integrity and its reputation as a provider of Higher Education.

All those to whom this policy applies must therefore

- consider whom they are acting for, and whether there are any competing motivations or interests that could influence them or be seen to influence them
- apply good judgement in assessing whether a situation may represent an actual, potential or perceived conflict. Each situation should be considered on its own merits
- disclose any actual, potential or perceived conflict of interest immediately and adhere to any conditions or measures which EMN may put in place.

Any individual with declared conflicts of interests should be able to carry out the duties under their contract with EMN without restriction for the benefit of the school and its academic community.

5. Handling of a conflict of interest

Step 1

An individual declares a conflict of interest, a potential conflict of interest or what could be perceived as a conflict of interest, to the Principal, the Office Manager or the Board of Directors

* Please note, reporting of conflict of interest is an ongoing process and a conflict of interest can arise at any time. Please discuss any doubts either with the Principal or the office manager.

Step 2

The Principal and/or the Board of Directors agree on next steps, for instance

- No action needed; the individual can continue working on the relevant duties as normal.
- The individual can continue to carry out relevant duties but control measures/adjustments will be applied
- The individual cannot continue to carry out relevant duties.

A conflict of interest should be avoided unless it can be properly managed using the above strategies. For example, in extreme cases, it may be necessary for an individual to resign one of the positions which is creating the conflict.

Step 3

The Principal or the Board of Directors will convey their decision and retain a record of the conflict of interest.

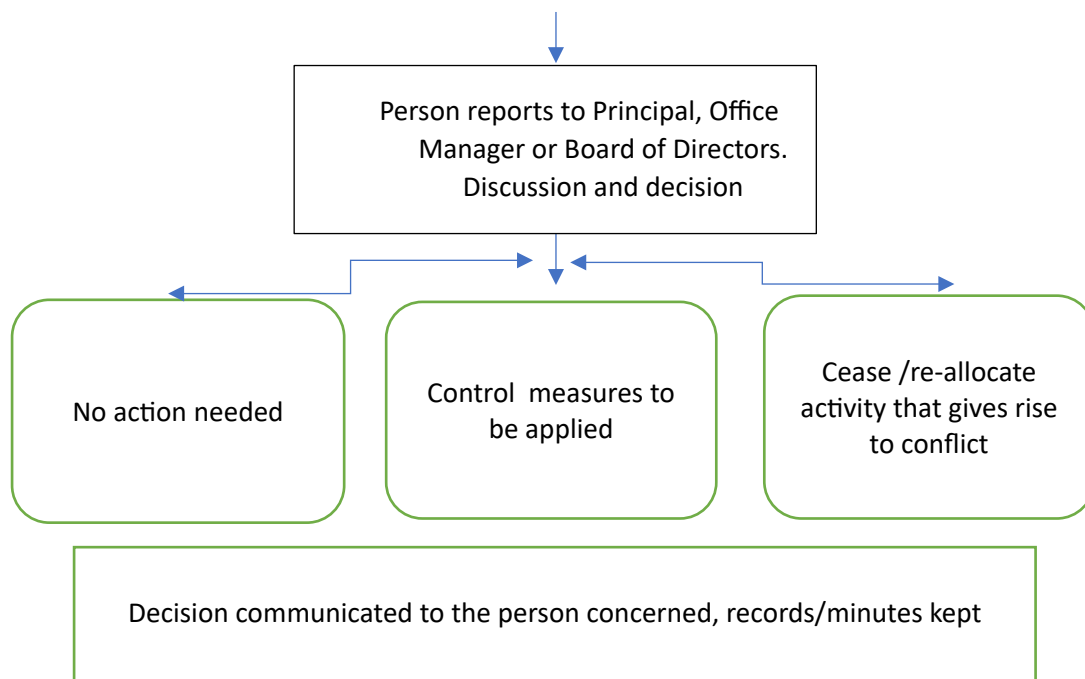
6. Examples of conflicts of interest (this list is not exhaustive)

Situation	Declaration	Possible Management Strategy
<p>Teaching, supervision, assessment, quality assurance and qualification rewarding</p> <p>A staff member who has a close personal or familial relationship with a student or a person connected to the student and who may be involved in decisions about the student's admission, supervision or academic progress, assessment and marking and the awarding of qualifications.</p>	<p>The Principal, the Board of Directors, the Office Manager</p>	<p>The student will be made aware of the disclosure and arrangements will be put in place to avoid the staff member having any professional connection with the student.</p>
<p>Research-related</p> <p>a) A researcher who has a financial interest in another company or organisation sponsoring or funding their research (or the research of a supervisee). This is exacerbated if the researcher's interest may be affected by the outcome of the research.</p> <p>b) A researcher or PI who holds or held a position in an external organisation, (e.g., as Director, Non-Executive Director, Chairman, etc.) is involved in negotiations for agreement or contract with this organisation.</p>	<p>The Principal, the Board of Directors, the Office Manager</p>	<p>Managing conflicts of interest in research is part of a researcher's responsibility</p> <p>The researcher declares this interest in all publications and as part of any application for ethical approval. The researcher should recuse themselves from any key decisions that could benefit the company.</p> <p>c) The Board of Directors must ensure that any conflict of interest in this area is properly managed. Concerned individuals should not be involved in such a decision-making process due to their conflict of</p>

<p>HR/recruitment related</p> <p>A staff member who would normally be involved in the selection process for a new appointment learns that a close family member is applying for the role.</p>	<p>The Principal, the Board of Directors, the Office Manager</p>	<p>interest. Any duties carried out by the person in relation to such an agreement if it is put in place, has to be carefully managed.</p> <p>No member of staff may be involved in the recruitment process where a relative is a candidate. Therefore, the staff member's role in the selection process should be carried out by another member of staff.</p>
<p>Board and Committee-related</p> <p>a) External committee member who advises or sits on committees of other HE providers</p> <p>b) A committee member who has an outside interest in an item on the agenda</p> <p>c) Student member of a committee, who is also part of a student society which has been lobbying for a policy that relates to one of the agenda items</p>	<p>The Principal or Board of Directors and Chair of Committee or Board</p>	<p>a) Membership of other bodies which could constitute a conflict of interest should be recorded on the Register of conflicts of interests.</p> <p>b&c) The individual should declare specific conflicts prior to a meeting to the Principal who will decide what action may be necessary, which may include the conflicted member:</p> <ul style="list-style-type: none"> ▪ absenting themselves from the discussion and decision of specific items; or ▪ remaining for the discussion but not the decision on the item; or

<p>Finance-related</p> <p>A staff member who takes part in the negotiation of a contract between EM Normandie UK Ltd and a supplier where they, or a person connected to them, has a financial or non-financial interest in that supplier.</p>	<p>The Principal, the Board of Directors, the Office Manager</p>	<ul style="list-style-type: none"> ▪ remaining for full item, but not participating in the decision. <p>The conflict and action should be minuted.</p> <p>The employee should declare the conflict prior to engaging the company, so that the Head of Institution can update the register of conflicts of interests and pre-authorise the engagement and/or expenses, if they are deemed appropriate.</p>
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Conflict of interest process map



Annex 1 – Control table

Version	v1	Name	Role	Date
Created by:		Shane De Fonseca	UK Head of QC and accreditations	30/10/2023
Approved by:		Miriam Schmidkonz, Principal		23-11-23
Version	v2	Name	Role	Date
Amended by:		Birgit Muller	Office Manager	August 2025
		Some changes to wording to clarify content.		
Changes approved by:		Miriam Schmidkonz, Principal		
Version		Name	Role	Date
Amended by:				
Changes approved by:				