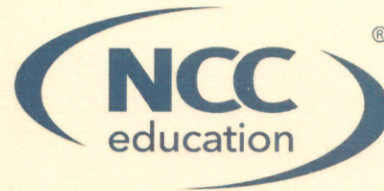




**SOUTH MEDITERRANEAN  
UNIVERSITY**



**Awarding  
Great British  
Qualifications**

## **CONFLICT OF INTEREST POLICY**



## 1. Definition

A **Conflict of Interest (COI)** is defined as a situation in which a person is entrusted with responsibility for making a decision or taking an action, and where that person, or an individual with whom they have a close personal or professional relationship, may derive an unfair or improper benefit by virtue of their position of responsibility or as a result of such decision.

Common circumstances in which a COI may arise within the activities of **South Mediterranean University** include:

- The registration or admission of candidates to programmes offered by South Mediterranean University.
- The assessment and evaluation of candidates.
- Internal corporate and administrative decisions.
- Procurement and purchasing decisions.
- Human resources and recruitment decisions.

### 1.1. Persons Who May Be Affected by a COI

The following persons are required to read, understand, and comply with this Policy:

- All employees of South Mediterranean University.
- All contracted examiners and moderators.
- All teaching, support, and senior management staff serving on committees or boards of the University.

### 1.2. Circumstances in Which a COI Must Be Declared

A Conflict of Interest **must be declared** in the circumstances set out below. Where there is any doubt as to whether a conflict exists, the individual concerned should err on the side of disclosure and declare the potential conflict.

**Type A:** Where a University employee, or any member of their immediate family, relative, or close personal associate, is registered for or undertaking a course leading to a South Mediterranean University qualification in respect of which the employee is involved, whether through teaching, administration, assessment, or any other related capacity.

**Type B:** Where a person falling within the categories identified above, or a company or organisation represented by such person, is under consideration for a contract with South Mediterranean University, and the person has, or may reasonably be perceived to have, an influence over the decision-making process. Examples include the procurement of goods or services from external providers and the appointment or recruitment of teaching staff.



## 2. Procedures for the Declaration of Interests

Any person who is required to declare a Conflict of Interest in accordance with the definitions and circumstances set out in this Policy must normally make such declaration **in writing or by email** to the Head of the University, using the contact details provided in Section 5 of this Policy.

Employees of South Mediterranean University who fail to disclose a Conflict of Interest, where such disclosure is required under this Policy, may be subject to **disciplinary action** in accordance with the University's applicable policies, procedures, and regulations.

### 2.1. Data Protection

Any personal or other information provided in connection with the declaration of a Conflict of Interest shall be handled and processed in accordance with applicable **data protection requirements and principles** and shall be treated as confidential to the extent permitted by applicable law and University policy.

## 3. Recusal

Where a Conflict of Interest has been declared, the person concerned shall be required to **recuse themselves** from any discussion, decision-making process, activity, or other proceedings that may be affected by the conflict.

Any person attending a meeting who has declared a Conflict of Interest but fails to recuse themselves may be required by the Chair to withdraw from the relevant meeting or part thereof.

Any person involved in the admission, assessment, or evaluation of a candidate who has declared a Conflict of Interest but fails to recuse themselves from activities relating to that candidate may be subject to disciplinary action in accordance with the University's applicable policies, procedures, and regulations.

## 4. What You Must Do if You Are Subject to a Conflict of Interest

Any person who becomes aware of an actual, potential, or perceived Conflict of Interest must promptly notify the Head of the University and must recuse themselves from any activity, discussion, assessment, decision, or other proceeding that may reasonably be affected by the conflict.

Individuals are expected to act with honesty, transparency, impartiality, and integrity when dealing with actual, potential, or perceived Conflicts of Interest. Any relevant conflict should be disclosed at the earliest opportunity so that appropriate measures may be taken to safeguard the University's decision-making processes and maintain public and institutional confidence.

## 5. Contact Details

Conflicts of Interest may be reported through the following channels:

**By email:** [k.jleta@smuni.ly](mailto:k.jleta@smuni.ly)

**By post:** For the attention of the CEO/Director

