


QUALITY ASSURANCE HANDBOOK

2019 Edition – Part A

Section 2: Overarching Policies (EXTRACT)

2019

2.10 Conflict of Interest Policy for Programme Delivery

Quality Assurance Handbook (QAH) Part A		
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Roles with Aligned Responsibility	HR, Head of Faculty and School Operations	
Applicability	All DBS Staff; All programmes: NFQ L6 to L9, Professional Programmes, Study Abroad, DBS Online	
Approved By	SLT	
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Additional Information	N/A	
References/ Supporting Documentation	Graham Holdings Company Code of Business Conduct	

2.10.1 Policy Overview

This policy lays out DBS's requirements around conflicts of interest as they pertain to DBS staff and all involved in the delivery of DBS programmes of study. It should be noted that DBS adheres to the Graham Holdings Code of Business Conduct.

2.10.2 Policy Statement

Conflict of interest is defined as a situation where an employee of DBS, or someone closely associated with them such as a family member or friend, is in a position, or may appear to be in a position, to derive personal or professional benefit from their relationship to DBS and actions arising therein.

As such, DBS staff may not engage in any activities which may pose ethical, legal, financial, or other conflicts of interest. Staff are obligated to ensure that their activities do not present any conflicts with the welfare of DBS and its activities and endeavours or to DBS students.

In order to establish whether a particular situation or scenario raises a possible conflict of interest, consider:

- Whether the matter would raise concern if known to colleagues/managers/students/other interested parties;
- Whether this would be of concern to you if you were aware of a colleague in this situation.

Business Operations

As per the Business Code of Conduct, DBS staff may not engage with any external activity that is in competition or conflicts with the mission and vision of DBS.

Students and Staff

Any staff member who has a pre-existing relationship with a student in DBS whom they are going to be teaching or assessing should declare this to their line manager. Policies and procedures exist to protect the integrity of assessment. Notwithstanding this, to avoid any perception of bias, any personal relationship should be declared.

Where a staff member has been previously involved in a process with a student, they should be removed or remove themselves for any subsequent escalation. For example, an examiner may not participate in an Appeal or Complaints process relating to an examinee.

NOTE:

It is standard practice in DBS, as with other Higher Education institutions, that the lecturers delivering modules usually also design and grade the assessments on the same module. This unified delivery can result in a potential or perceived conflict of interest, which College policy mitigates through the Internal Moderation and External Examiner review processes to ensure integrity of assessment. Lecturer-examiners should be conscious of this potential conflict of interest and, in addition to the moderation process, ensure they self-monitor to avoid a conflict of interest developing internally.

Declaration

Where any doubt exists, or the possibility of perception of conflict of interest may arise, all parties are obligated to report this to their line manager, HR or another senior member of staff to review the case. It is important to appreciate that **perception** of a conflict of interest must be dealt with to allow for full transparency and to ensure confidence in the integrity of all operations.

Note, if in doubt, it is required to report the matter.