Conflict of Interest Policy

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Version Control

Version	Date	Author	Changes
1.0	25/07/2024	Elaine Nicholson	Initial policy creation
1.1	26/08/2025	Patsy Crocker	Reviewed for consistency
2.0	Jan 2026	Sophie Gilmore	Major revision: expanded scope covering assessment and IQA, detailed examples by role, declaration form and register, training provider-specific guidance

1. Purpose

This policy establishes the framework for identifying, declaring, and managing conflicts of interest at Hybrid Training Centre (HTC). Conflicts of interest can undermine the integrity of decisions, damage trust, and expose HTC and individuals to reputational and legal risks.

As a training provider delivering publicly-funded programmes and accredited qualifications, HTC has particular responsibilities to ensure that conflicts of interest do not compromise the integrity of assessment, funding claims, or relationships with regulatory bodies and awarding organisations.

This policy aims to:

- Protect the integrity of HTC's operations, particularly assessment and certification
- Maintain the trust of learners, employers, awarding organisations, and funding bodies
- Protect staff from allegations of impropriety
- Ensure compliance with awarding organisation requirements
- Uphold the principles of public life in the use of public funds

2. Scope

This policy applies to:

- All HTC employees, including permanent, temporary, and casual staff
- Directors and members of the Senior Leadership Team
- Contractors, consultants, and agency workers
- Assessors, trainers, and Internal Quality Assurers (IQAs)

- External consultants or associates acting on behalf of HTC
- Anyone involved in recruitment, procurement, or decision-making on behalf of HTC

The policy covers actual, potential, and perceived conflicts of interest arising from personal, family, financial, or professional relationships.

3. Principles

HTC is committed to conducting its business in accordance with the Seven Principles of Public Life (Nolan Principles):

- Selflessness – Acting solely in the public interest
- Integrity – Avoiding obligations to outside individuals or organisations that might influence work
- Objectivity – Making decisions based on merit
- Accountability – Being accountable for decisions and actions
- Openness – Being transparent about decisions and reasons
- Honesty – Declaring any private interests relating to public duties
- Leadership – Promoting and supporting these principles by example

All staff should conduct themselves with integrity, impartiality, and honesty, avoiding situations where they or HTC could be open to suspicion of impropriety.

4. Key Definitions

Conflict of Interest: A situation in which a person's personal interests, relationships, or loyalties could, or could be perceived to, improperly influence their judgement, decisions, or actions in their role at HTC.

Actual conflict: A direct conflict exists between an individual's role and their personal interests.

Potential conflict: A situation that could develop into an actual conflict.

Perceived conflict: A situation that might reasonably appear to others to be a conflict, even if no actual conflict exists.

Personal interest: Any financial, personal, family, or professional interest that could influence, or appear to influence, an individual's actions.

Connected person: A spouse, partner, close family member, or any person with whom the individual has a close personal or business relationship.

5. Types of Conflict of Interest

5.1 Assessment and Quality Assurance

In a training provider context, assessment-related conflicts are particularly significant. Examples include:

- Assessing a learner who is a family member, friend, or with whom you have a personal relationship
- Assessing a learner employed at a company where you have a financial interest
- Acting as IQA for assessment decisions made by a family member or close friend
- Conducting EPA preparation for a learner where there is a personal connection
- Making certification decisions for learners with whom you have a non-professional relationship

5.2 Recruitment and Employment

Examples include:

- Participating in recruitment where a candidate is known personally
- Being involved in decisions about pay, promotion, or performance of a family member or friend
- Managing or supervising someone with whom you have a close personal relationship
- Providing references for personal acquaintances without disclosure

5.3 Procurement and Suppliers

Examples include:

- Influencing purchasing decisions where you have a relationship with a supplier
- Accepting hospitality or gifts that could influence procurement decisions
- Having a financial interest in a company bidding for HTC contracts
- Receiving preferential terms from suppliers for personal purchases

5.4 External Activities

Examples include:

- Undertaking private consultancy work that competes with or conflicts with HTC's interests
- Working for another training provider without disclosure
- Using HTC resources, contacts, or information for personal benefit

5.5 Staff and Learner Relationships

Professional boundaries must be maintained between staff and learners:

- Personal relationships of a romantic or sexual nature between staff and learners create conflicts of interest
- Such relationships must be disclosed immediately
- Alternative assessment and supervision arrangements will be made
- In some circumstances, particularly involving learners under 18 or vulnerable adults, such relationships may constitute safeguarding concerns

6. Responsibilities

6.1 All Staff

- Identify and disclose any actual, potential, or perceived conflicts of interest
- Complete an annual declaration of interests
- Update declarations promptly when circumstances change
- Withdraw from decisions or activities where a conflict exists
- Seek guidance when uncertain

6.2 Assessors and IQAs

- Declare any relationship with learners that could affect assessment objectivity
- Decline to assess learners where a conflict exists
- Ensure IQA sampling arrangements avoid conflicts
- Report any attempts to influence assessment decisions

6.3 Line Managers

- Ensure team members understand and comply with this policy
- Manage disclosed conflicts appropriately
- Make alternative arrangements where necessary
- Escalate complex or sensitive conflicts to the COO

6.4 Head of Quality

- Maintain the Conflict of Interest Register
- Review declarations and determine appropriate management actions
- Ensure awarding organisation requirements are met
- Report to the Senior Leadership Team on conflicts affecting quality assurance

6.5 Senior Leadership Team

- Promote a culture of transparency and disclosure
- Model appropriate behaviour
- Ensure adequate systems are in place for managing conflicts
- Review the Conflict of Interest Register annually

7. Declaration and Disclosure

7.1 Annual Declaration

All staff are required to complete a Declaration of Interests form annually (at the start of each academic year). Even if there are no interests to declare, a nil return should be submitted.

7.2 Ongoing Disclosure

Conflicts must be disclosed as soon as they arise or become apparent. Disclosure should be made:

- In writing to your line manager and the Head of Quality
- At the start of any meeting where a conflict may arise
- Before participating in any decision or activity where a conflict exists

7.3 At Meetings

Where a conflict arises at a meeting, the individual must:

- Declare the interest before or as discussion begins on the relevant item
- Withdraw from the meeting for that item unless expressly invited to remain to provide information
- Not participate in any vote or decision
- Confirm the declaration in writing to the Head of Quality

7.4 If in Doubt

If unsure whether a conflict exists, staff should err on the side of caution and disclose. It is better to declare something that turns out not to be a conflict than to fail to declare something that is.

8. Managing Declared Conflicts

Once a conflict is declared, the Head of Quality (in consultation with the line manager and COO where appropriate) will determine the appropriate management action. Options include:

- No action required – the conflict is minor or unlikely to affect decisions
- Monitoring – the situation is noted and kept under review
- Restriction – the individual is excluded from specific decisions or activities
- Reassignment – alternative arrangements are made (e.g., different assessor, different IQA)
- Prohibition – in serious cases, involvement in the activity is prohibited entirely

The outcome will be recorded on the Conflict of Interest Register and communicated to the individual.

9. Gifts and Hospitality

Gifts and hospitality can create or appear to create conflicts of interest. Staff must:

- Decline gifts of more than token value (£10) unless approved
- Disclose hospitality received with a value exceeding £50
- Record all gifts and hospitality in the Gifts and Hospitality Register (see Anti-Bribery Policy)
- Never accept cash or cash equivalents
- Never accept gifts or hospitality that could reasonably be seen as an inducement

Further guidance is provided in the Anti-Bribery and Incentives Policy.

10. Private Work and Outside Interests

Staff may undertake private work or outside activities provided that:

- It does not conflict with HTC's interests
- It does not impair performance of HTC duties
- It is disclosed in the annual declaration
- It is approved by the line manager where it may affect HTC work
- HTC resources, branding, or information are not used

Working for a competitor training provider, or undertaking assessment or training activities that could conflict with HTC's business, requires specific approval from the COO.

11. Conflict of Interest Register

The Head of Quality maintains a Conflict of Interest Register containing:

- Annual declarations from all staff
- In-year disclosures
- Management actions taken
- Monitoring records

The register is reviewed by the Senior Leadership Team annually and is available for inspection by awarding organisations and auditors.

12. Failure to Disclose

Failure to declare a conflict of interest, or providing incomplete or inaccurate information, is a serious matter that may:

- Constitute misconduct or gross misconduct
- Result in disciplinary action up to and including dismissal
- Be reported to awarding organisations
- Affect professional registration or membership

Where a failure to disclose results in an assessment malpractice, this will be dealt with under the Malpractice and Maladministration Policy.

13. Related Documents

- Anti-Bribery and Incentives Policy
- Assessment Policy and Procedures
- Internal Quality Assurance Strategy
- Malpractice and Maladministration Policy
- Code of Conduct
- Disciplinary Policy
- Procurement Policy
- Safeguarding Policy

14. Monitoring and Review

This policy is monitored through:

- Annual review of the Conflict of Interest Register
- Internal audit of declaration compliance
- Analysis of any issues arising from undisclosed conflicts
- Feedback from awarding organisation quality assurance visits

The policy is reviewed annually by the Head of Quality or sooner if required by changes to regulatory requirements or awarding organisation guidance.

Policy Approval

Signature: Date:

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Sophie Gilmore
Group Chief Executive Officer