Conflict of Interest Policy

Issued: JANUARY 2016
Conflict of Interest Policy

Terminology

<table>
<thead>
<tr>
<th>The Term ....</th>
<th>Will hereinafter refer to…</th>
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</thead>
<tbody>
<tr>
<td>Directors</td>
<td>The Directors of Consortia Training.</td>
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<tr>
<td>Company Directors</td>
<td>The Directors of Consortia Training Funded Organisations</td>
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<tr>
<td>Subcontractors</td>
<td>All Consortia Training Funded Organisations</td>
</tr>
<tr>
<td>Personnel</td>
<td>Any personnel employed by Consortia Training and/or the Subcontractors and partner organisations that are responsible for deliver or support of Consortia Training Funded Learners.</td>
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<tr>
<td>Partner Organisations</td>
<td>Employers and work placement providers of Consortia Training Funded Learners.</td>
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Purpose

The purpose of this policy is to ensure that the integrity of Consortia Training, the learning programs and the qualifications that Consortia Training delivers are protected. This policy will also provide guidance on handling possible conflicts of interest that may arise, as a result of Consortia Training and its subcontractors’ role as deliverers of training programmes and apprenticeships. The policy will outline who is responsible for managing any areas of conflict of interest that may arise.

What is a conflict of interest?

A conflict of interest is a situation in which an individual, or organisation has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise Consortia Training or appear to compromise the individual’s effectiveness in their job role if not properly managed. Some examples of conflicts of interest are: when an individual has a position of authority in one organisation that conflicts with their interests in another organisation; when an individual has interests that conflict with their professional position; where someone works for or carries work out on behalf of Consortia Training but may have interests, paid or unpaid, in another business which is in competition with Consortia Training funded services or delivers similar services or where a Consortia Training funded member of staff has friends or relatives undertaking Consortia Training programmes, assessments and exams. (These are examples only and this is not exhaustive list.) This also applies where a subcontracting agreement is being considered.

Persons Involved

This policy applies to all Consortia Training personnel, Directors, centre personnel, associate and freelance staff and assessment associates as well as any subcontracting agreements in place or proposed.

It is the responsibility of each individual to recognise situations in which they may have a conflict of interest or might reasonably be seen by others to have a conflict, to disclose that conflict to the appropriate Director of Consortia Training as soon as they recognise
that a potential conflict may occur. If an individual is uncertain about how this Policy might affect their activities or has any questions, they should contact the relevant Director of Consortia Training (the Director of the individual’s Consortia Training place of work).

- All Consortia Training funded staff within Consortia Training has responsibility for ensuring that they are familiar with the Conflict of Interest Policy and all relevant guidelines.

- All Consortia Training funded staff will be required annually to read and understand the Conflict of Interest Policy.

- All Consortia Training funded staff must disclose any activity that might give rise to a potential conflict of interest. If there is any doubt whether or not it represents a conflict of interest report it!

- The individual and centre manager are equally responsible for documenting the issue carefully.

- An individual may wish to raise concerns relating to conflict of interest directly with their centre manager. This may be done in confidence and they are entitled to receive a response to their concerns. It should be noted that individuals are protected under the company's Whistle Blowing Policy.

- Any staff member considering paid or unpaid work outside Consortia Training should inform their manager if they think there is any potential for a conflict of interest. If the staff member is unsure whether a conflict of interest might arise, they should discuss this with their centre manager first. The centre manager should contact the Directors if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A staff member must not take on any such activities that could be deemed to compete or conflict with Consortia Training activities.

**Time-scale**
This policy has no particular time constraints and is an ongoing process.

**Related Documentation**
This policy has no specific related documentation.

**Training and Induction to the Policy**

**Organisations Funded by Consortia Training**

All organisations will receive a copy of the Consortia Training Conflict of Interest Policy and access and awareness of the policy will be raised through subcontractors’ meetings. The Centre Directors will ensure all Individuals new to centres and any existing personnel will be made aware of the policy and its meaning. Further training needs will be assessed on a continued basis and in response to audit outcomes. Organisations will be asked to sign a declaration to register their understanding and agreement with this policy.
Conflict of Interest Policy

**Procedure**

The centres will ensure no conflicts of interest impact negatively on Consortia Training by...

- Reviewing process annually to ensure that all conflicts of interest or potential conflicts of interest are managed and resolved.

- Ensuring that all Consortia Training funded staff declare any interest for friends or family that may undertake learning programs, services or any types of Consortia Training business delivered within Consortia Training programs.

- Managing the potential and actual conflicts of interest at the highest level by ensuring the Directors of Consortia Training have ultimate responsibility for this. The Quality Improvement Team has responsibility for the dissemination of the policy.

- If any such conflicts of interest are raised, Consortia Training Directors will in the first instance discuss if there is a conflict of interest and the level of risk. Dependent on the agreed level of risk, Consortia Training Ltd Directors will issue an action plan and monitoring agreement for a low risk conflict and in the case of a high risk conflict, the SFA will be notified in writing.

**Impact Assessment**

This policy will be impact assessed for equality and diversity and records will be maintained.

**Safeguarding**

This policy will be reviewed to ensure it fully safeguards learners, personnel and other partners in relation to their levels of safety, health, achievement, enjoyment, contribution and well-being.

**Monitoring, Review and Evaluation**

**Monitoring of Process and Information**

Consortia Training Directors will monitor the Conflict of Interest Policy. In the case of a subcontractor non-compliance with the nature of this policy, the Quality Improvement Team will monitor the process and their link director will be kept informed and be involved as appropriate. The Directors of Consortia Training will be informed and updated as necessary.

**Monitoring of Documentation and Policy**

The Quality Improvement Team reviews the policy and documentation bi-annually (or earlier if required). Communications, either written or electronic, will notify subcontractors, of all monitoring processes. The updated policy will be submitted to
Conflict of Interest Policy

Consortia Training Directors meetings for approval/ratification. The completed policy available on a VLE where possible or if not a copy will be made available within the centre.

Monitoring and escalation

The Centre Managers are responsible for escalating reports of actual or potential conflicts of interest to the Directors. The Directors will begin an investigation of any issues identified by the Centre Managers within 24 hours. A preliminary report will be made available to the Centre Manager and Centre Director concerned within 5 working days.

Grievances or Complaints in Relation to the Conflict of Interest Policy

Consortia Training funded staff, learners or employers have the right to lodge a complaint or grievance about any of the areas covered under the Conflict of Interest Policy. An Consortia Training funded employee who is not satisfied with the action taken by Consortia Training and feels it right to question the matter further, may consider the following possible contact points:

- Skills Funding Agency
- The employee’s trade union
- The Citizens’ Advice Bureau and / or law centre / firm
- Relevant professional bodies or regulatory organisations
- The local government ombudsman
- The information commissioner
- A relevant voluntary organisation

Approved by the Directors of Consortia Training on 19th January 2016

Signed: S. Bamford

Signed: G. Daniels

Signed: G. Iannantuoni

Signed: S. Lilley