



Your Workforce Reimagined

Conflicts of Interest Policy



Document details:

Version	Description	
1.0	Date Live:	2 nd December 2019
	Version Notes:	Updated policy content, branding & design of document.
	Reviewed by:	Raj Babber - 28 th November 2019
	Approved by:	Jonathan Evans - 29 th November 2019
2.0	Date Live:	15 th February 2021
	Version Notes:	Update to document control policy, which has been reflected.
	Reviewed by:	Raj Babber - 15 th February 2021
	Approved by:	Jonathan Evans - 15 th February 2021

The next scheduled date to review this policy is: 15th February 2022.

Discovery (hereafter “the company”) is committed to ensuring that all employees, facilitators, and stakeholders strive to avoid any conflict of interest between the organisation and personal, professional, and business interests, as a result of their roles within the company.

All employees and facilitators are required to disclose any existing or potential conflict of interest as soon as it arises. Failure of an employee or facilitator to declare a conflict of interest may result in disciplinary action.

This policy applies to all employees, facilitators, and stakeholders whenever they interact or potentially interact with the company, in order to maintain the integrity of the company, the training it delivers, the recruitment projects it delivers and stakeholders it works with. The most important feature of the policy is the instruction that individuals should always disclose an activity if there is any doubt about whether it represents a conflict of interest. The aim of the policy is to protect the company, associated stakeholders and the individuals concerned from any appearance of impropriety.

1. DEFINITION

Conflict of interest can be defined as a situation/conflict between the official responsibilities of an individual (tutor, assessor, examiner, internal verifier) or organisation/centre/stakeholder which could compromise or appear to compromise their decisions. Conflicts of interest can arise in a variety of circumstances and are not exhaustive, for example:

- A situation that has the potential to undermine the impartiality of an individual because of the possibility of a clash between the individual persons self-interest and professional interest or public interest.
- Personal interests – conflict with his/her professional position when one part of the company follows a procedure that conflicts with the organisation’s official policy and the requirements of its awarding organisations.

2. SCOPE

This policy applies to all employees, facilitators and stakeholders who interact or potentially interact with the work of the company. This includes individuals involved with all aspects of devising, setting, tutoring, assessing, marking, administering, invigilating, internally verifying or any other areas where conflict of interest may arise.

The individuals falling within the scope of this policy include full-time and part-time staff of the company, and any associate staff including external examiners. The content of the policy cannot cover every

potential conflict and is not exhaustive and must be interpreted in the light of the particular circumstances of each case. Staff have a responsibility to use their judgement and if in doubt, discuss their concerns and issues with their higher authority within the centre.

3. OBJECTIVES

- to ensure that any possibility of conflict of interest is disclosed immediately
- to identify and minimise the risk of conflict of interest arising within the company
- to respond to any incident promptly and objectively
- to standardise and record any incident to ensure openness and fairness
- to protect the integrity of the company, awarding organisations and related stakeholders

4. PROCEDURE – (Actions/implementation)

If any person should declare a conflict of interest it must be done so in writing. For conflicts relating to programmes or training, this must be sent to the **Director of Programmes and Apprenticeship Learning, Raj Babber**. For conflicts of interest relating to recruitment, this must be sent to the **Commercial Director, Sarah Evans**. Failure to declare interest may be subject to disciplinary action or contract withdrawal.

Any information provided when declaring an interest will be treated in accordance with data protection principles. Data will be processed only to ensure that relevant persons act in the best interest of the company, the information will not be used for any other purpose.

Once a conflict of interest has been declared, the relevant person will be withdrawn from any activities that may be affected by the conflict.

5. FURTHER ACTIONS TAKEN BY THE COMPANY

The company may take internal disciplinary action in line with Policy and Procedures, in the case of a non-declaration. This action will be commensurate with the seriousness of the Conflict of Interest and comply with appropriate employment legislation and awarding organisations requirements who may impose penalties or sanctions.