STAFFPOWER GROUP

RECRUITMENT & TRAINING

Conflict of Interest Policy

| Version 2.0 |

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Summary of Changes from Version 1.0 to Version 3.0

- Expanded examples of actual, potential and perceived conflicts of interest.
- Introduced mandatory Conflict of Interest Declarations for relevant personnel.
- Added escalation arrangements for conflicts involving senior managers.
- Established formal monitoring and annual review of the Conflict of Interest Register.
- Strengthened accountability and disciplinary provisions.
- Added requirements for data protection, record retention and confidentiality.
- Introduced links to related organisational policies and procedures.
- Improved governance, transparency and compliance arrangements across assessment, quality assurance and organisational decision-making processes.

1. Introduction

1.1 This policy outlines the procedures and guidance for ensuring the online safety of all learners and staff at Staff Power Training (SPT). Our aim is to create a safe and respectful online environment that allows for effective learning while protecting individuals from potential harm. It has been developed in line with key national guidance, including the UK government's "Keeping Children Safe in Education" and best practice recommendations from the UK Safer Internet Centre.

2. Scope

2.1 This policy applies to all employees, contractors, volunteers, and associates of SPT who are involved in the delivery, administration, and support of training programs.

3. Definitions

3.1 Conflict of Interest (COI): A situation where an individual's personal, financial, or other interests could improperly influence or appear to influence their professional judgment and actions.

3.2 Disclosure: The act of reporting a potential or actual COI to the appropriate authority within the organization.

4. Process

4.1 Identification of Conflicts of Interest

All individuals covered by this policy are responsible for identifying situations where their personal, financial, or other interests may conflict with their duties and responsibilities. Examples of COIs include, but are not limited to:

· Personal relationships with learners, apprentices, employers, subcontractors, or staff members that could affect impartiality.

· Assessing, reviewing, or quality assuring the work of a family member, friend, partner, or close associate.

· Financial interests in the success, failure, or continuation of a training programme, contract, or supplier arrangement.

· Ownership, employment, or consultancy involvement with a competing training provider.

· Participation in recruitment, promotion, disciplinary, or performance management decisions involving family members or close associates.

· Accepting gifts, hospitality, incentives, or benefits that could influence professional judgement.

· Holding multiple roles within the organisation that could compromise objectivity or independence.

· Involvement in procurement, purchasing, or supplier selection where a personal interest exists.

· Any situation where an individual's personal interests could influence, or be perceived to influence, decisions relating to learners, assessment outcomes, funding, quality assurance, or organisational operations.

4.2 Disclosure of Conflicts of Interest

Individuals must disclose any potential or actual COIs as soon as they become aware of them. Disclosures should be made in writing and emailed to quality@staffpowergroup.com and submitted to the Head of Quality and Staff Development.

Where the disclosed conflict relates to the Head of Quality & Staff Development, the matter shall be referred directly to the Managing Director or nominated independent senior manager.

4.3 Periodic Conflict of Interest Declarations

All employees, contractors, volunteers, associates, assessors, internal quality assurers, and managers must complete a Conflict of Interest Declaration:

· Upon commencement of employment or engagement.

· Annually as part of the organisation's compliance review process.

· Whenever a new actual, potential, or perceived conflict of interest arises.

· Prior to undertaking assessment, quality assurance, certification, or decision-making activities where a conflict may exist.

Individuals are responsible for ensuring their declarations remain accurate and up to date. Failure to declare a Conflict of Interest may result in disciplinary action and removal from relevant activities pending investigation.

All declarations shall be recorded within the Conflict of Interest Register and retained in accordance with the organisation's document retention requirements.

4.4 Review and Management of Conflicts of Interest

Upon receiving a disclosure, the Head of Quality and Staff Development will:

- Review the disclosure to determine the nature and extent of the conflict.

- Discuss the situation with the individual involved to gather additional information if necessary.

- Decide on the appropriate action to manage or resolve the conflict.

- Reassigning duties to remove the conflict.

- Implementing additional oversight or review mechanisms.

- Recusing the individual from decision-making processes related to the conflict.

4.5 Monitoring and Record Keeping

All declared Conflicts of Interest, management actions, and associated decisions shall be recorded within the Conflict of Interest Register.

The Head of Quality & Curriculum is responsible for maintaining the register and ensuring that records are accurate, complete, and reviewed on a regular basis.

The Conflict of Interest Register shall be reviewed at least annually to identify emerging risks, recurring conflicts, and opportunities for improvement.

Access to Conflict of Interest records will be restricted to authorised personnel and managed in accordance with the organisation's Data Protection Policy.

Conflict of Interest records shall be retained in line with the organisation's document retention requirements and relevant legal, regulatory, and awarding organisation requirements.

Any significant or recurring conflicts identified through monitoring activities will be reported to senior management and appropriate corrective actions implemented.

- Document the decision and any actions taken in the Conflict-of-Interest Register.

5. Training and Education

5.1 SPT will provide regular training to all staff on identifying, disclosing, and managing COIs. This training will include examples of common COIs and guidance on the disclosure process.

6. Confidentiality

6.1 All disclosures and related discussions will be treated confidentially to the extent possible, consistent with the need to review and address the conflict.

7. Accountability

All employees, contractors, volunteers, associates, assessors, and managers are responsible for complying with this policy and promptly declaring any actual, potential, or perceived Conflict of Interest.

Failure to declare a Conflict of Interest, provide accurate information, or comply with agreed control measures may result in appropriate action being taken, including:

· Removal from specific duties, assessments, quality assurance activities, recruitment decisions, or other relevant responsibilities.

· Increased supervision or monitoring of activities.

· Investigation in accordance with the organisation's policies and procedures.

· Disciplinary action where appropriate.

· Termination of employment, engagement, or contractual arrangements in serious cases.

Where a Conflict of Interest presents a significant risk to the integrity of assessment, quality assurance, funding, certification, or regulatory compliance, SPT may take immediate action to mitigate the risk and, where required, notify relevant awarding organisations, funding bodies, regulators, or other stakeholders.

8. Responsibilities

8.1 Employees and Associates: Responsible for identifying and disclosing COIs.

8.2 Head of Quality and Staff Development: Responsible for reviewing disclosures, determining appropriate actions, and maintaining records.

8.3 Management: Responsible for ensuring compliance with this policy and supporting a culture of integrity and transparency.

9. Related Documents

This policy should be read in conjunction with the following organisational policies and procedures:

· Data Protection Policy

· Whistleblowing Policy

· Staff Code of Conduct

· Recruitment and Selection Policy

· Equality and Diversity Policy

· Disciplinary Policy

· Gifts and Hospitality Policy (where applicable)

Where a Conflict of Interest relates to any of the areas covered by the above policies, the requirements of those policies should also be followed.

10. Policy Review

10.1 This policy will be reviewed annually, or more frequently if there are significant changes in legislation, working practices, or following any related incidents.