



Action Community Enterprises CIC (ACE)

Conflict of Interest Policy



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Policy holder:	Lou Gardiner
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Conflict of Interest Policy

Purpose

The purpose of this policy is to provide guidance to relevant individuals on handling possible conflicts of interest that may arise as a result of ACE's role as a training provider, assessor and verifier of accredited units and qualifications. This policy applies to all staff and other individuals whenever they interact or potentially interact with any of ACE's training functions.

This policy:

- defines what is meant by conflict of interest
- sets out the roles and responsibilities for managing conflict of interest
- illustrates potential conflict of interest situations.

Scope

It is the policy of ACE that all staff, directors, assessors and internal verifiers acting on behalf of ACE must be free from conflicts of interest that could adversely affect their judgement or objectivity to the organisation in conducting business activities and assignments. Potential conflict of interest, and the process for mitigating this is documented below:

Any conflict of interest should be disclosed and recorded on the register by the the Head of Finance. If the individual concerned has any changes to their declared circumstances, they must inform their line manager immediately in writing, so that the conflict of interest can be evaluated, and the register updated. The information submitted is then evaluated to identify if any further action is required and a written record of the outcome of the evaluation is kept.

Definition of conflict of interest

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. Conflicts of interest can arise in a variety of circumstances in relation to a training organisation's activities, for example:

- when an individual has a position of authority in one organisation which conflicts with his or her interests in another organisation
- when an individual has personal interests that conflict with his/her professional position
- where someone works for or carries out work on a training organisations behalf, who has friends or relatives taking assessments there.

- A conflict of interest may generally be defined as a conflict between the official responsibilities of a tutor, assessor, and internal verifier and any other interests the particular individual may have and as such could compromise or appear to compromise their decisions
- A person who is connected to the development, delivery or award of qualifications by the organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award in accordance with the awarding organisations conditions of recognition.

Action

Most situations require no further action than the completion of the conflict of interest register. In some instances, however, the information declared will require some follow up action, in order for the conflict of interest to be managed appropriately. At ACE the approach agreed between the CEO/Managing Director and the tutor/staff member, will be documented and held with the conflict of interest register.

Examples of actions that could be taken

- Individual not taking part in discussions or decisions of certain matters
- Referring certain matters such as assessment, verification and recommendations for credit for decision to others with no vested interest
- Agreeing not to be involved in a particular project
- Declaring an interest when it is appropriate to do so
- Referring the matter to the ACE senior management team for advice and guidance.