

1. Purpose

1.1 The purpose of this policy is to set out the principles to be followed to ensure a consistent and effective approach to managing potential conflict between staff roles and responsibilities and the professional and commercial interests of More Training.

2. Scope

2.1 This policy applies to all staff, learners, contractors and third-party agents involved with More Training.

3. Policy Statement

3.1 More Training is committed to creating and maintaining principles of openness, fairness and impartiality and will ask staff to disclose any personal interest which may conflict with the interests of the employers and learners with whom they may be asked to work. This is to protect staff members from allegations that their impartiality has been compromised by their private or commercial interests.

3.2 This policy provides a set of principles to guide staff in identifying relevant interests which must be disclosed to More Training via line managers and sets out More Training's approach to allocating roles and responsibilities.

4. Definitions

4.1 A conflict of interest is a situation in which a person or organisation is involved in multiple interests, financial or otherwise, and serving one interest could involve working against another. It is reasonable for employers to require disclosure of potential conflicts of interest to avoid a situation where an individual or organisation could seek to exploit a staff member for personal or other benefit.

4.2 Even if the staff member doesn't actually benefit a conflict can still occur if it appears that their behaviour or judgement may have been, or even conceivably could have been, impaired or influenced by competing interests.

5. Disclosing potential conflicts of interest and allocating work

- 5.1 Staff must disclose all relevant personal, financial or other interests as set out below on first taking up work with More Training. These disclosed interests will be recorded by More Training to assist in the proper and efficient allocation of work. Before staff members accept any responsibilities in their course of their employment they must review and update their disclosed interests and consider whether their interests might put them in conflict with their duty to act fairly, openly and impartially.
- 5.2 More Training will not allocate work in the circumstances described below where a staff member might have (or be perceived to have) a personal or financial interest in the outcome of their decision-making and it is considered that there is a real risk of an actual or perceived conflict of interests arising which would undermine their impartiality.
- 5.3 Relevant interests are not confined to the examples set out below. It is the responsibility of staff members to identify and keep under review all personal, financial or other interests which may be relevant to More Training's operations and to advise More Training accordingly.
- 5.4 If a conflict of interest becomes apparent following allocation of responsibilities staff members may be required to:
 - 5.4.1 step aside from the relevant responsibility
 - 5.4.2 abandon the interest (if practical to do so)
 - 5.4.3 bring the matter to the attention of the relevant parties and seek their views to enable More Training to consider whether it is appropriate for the staff member to continue working with the relevant parties.

6. Potential conflicts of interest

- 6.1 Staff members must disclose to More Training the following interests, affiliations and involvements:
 - 6.1.1 any financial interests in any entity which is involved in More Training operations. More Training SMT will consider whether a staff member might gain, or be perceived to gain, a financial advantage as a result

of their relevant decision-making responsibilities which might undermine impartiality.

- 6.1.2 any concurrent paid or unpaid employment or business generally relevant to More Training's operations. Staff members in these instances will generally not be allocated to work with these entities on behalf of More Training.
- 6.1.3 any previous paid or unpaid employment or business generally relevant to More Training's operations held or carried out within the past three years.
- 6.1.4 any representative offices to which they have been elected on a party-political basis and any national or local political activities.
- 6.1.5 any membership of any professional or social organisations or any non-government organisations whose objectives are generally relevant to More Training's operations.
- 6.1.6 any interests of family and close associates including partner, parents, partner's parents, children and partners of adult children relevant to More Training's operations.
- 6.1.7 any individual or organisation you have contact with in the course of your work with More Training that a reasonable member of the public might think you would be prepared to favour or disadvantage.

7. Gifts, Benefits and Hospitality

- 7.1 Staff members should not accept gifts or hospitality which may, or may appear to, impair or influence their impartiality.

8. Sanctions

- 8.1 If interests are not disclosed and there is subsequent complaint or litigation on the grounds of impropriety, disciplinary action will be taken.