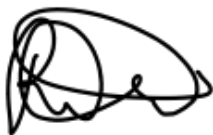




# Multi Trades Training

## Conflict of Interest Policy

Review Date: July 2024

<b>Approved by</b>	RK Jones	<b>Position</b>	Director
		<b>Date</b>	5 <sup>th</sup> June 2023

### Document Control

Date	Review & Revision	By
05/06/2023	No Revision	Quality Lead

## **Aim**

As an employer, the Multi Trades Training Ltd (MTT) recognises there is a risk of conflict of interest, or potential conflict of interest, in its appointment of staff, whether permanent or contractual.

The aim of this policy is to protect the integrity of MTT's decision-making process, and to protect individual staff members from compromise, and as a result, has developed this policy to assist and deal with Conflicts of Interest and state the action it takes to prevent such conflicts of interest from occurring.

A conflict of interest may be defined as including:

*'a conflict between the contractual and official responsibilities of a person in a position of trust and any other interests the particular individual may have, e.g., where the individual could be seen to be influencing the matters of MTT for actual or potential personal benefit or seeking such a gain at the expense of the MTT.'*

The definition is not restricted to those cases in which an individual actually betrays that trust but can also apply to those considered as damaging for the conflict to exist or *appear* to exist.

It is the policy of MTT that employees, contractors, consultants, and others acting on behalf of MTT should be free from conflicts of interest, or potential conflicts of interest, which could adversely influence their judgment, objectivity, or loyalty to the MTT or its stakeholders, including learners, when conducting MTT's training and assessment activities.

In line with this, MTT adopts a three-hold approach:

- Encourage disclosure
- Manage any conflict of interest
- Prohibit any activity necessary to protect the interest of MTT

MTT recognises that employees and others, acting on behalf of the organisation may engage in a wide range of activities, for example, consultancy, or take part in legitimate financial, business, charitable and other activities outside MTT.

While MTT recognises that these activities can bring many advantages, they also have the potential for diverting attention from the primary role and while most contracted staff are permitted to undertake private consultancy, MTT needs to ensure that such work or consultancy should avoid actions, situations or relationships which might conflict, or appear to conflict, with their interests.

## **Potential conflicts of interest of employees and others acting on its behalf**

There are 2 categories of conflict:

- Conflict of Interest (detailed below)
- Conflict of commitment – when the external activities are so demanding that the performance of the individual in their primary role with MTT is compromised.

The following are examples of potential conflicts of interest that could apply to employees and others acting on its behalf, the following are examples and not limited to, or exhaustive:

- using a position within MTT to influence the results of an assessment, for example of a relative or acquaintance
- using company confidential information for personal gain or advantage
- having a second job or consulting relationship:
  - a) which could affect that person's ability to satisfactorily perform the MTT's duties and obligations, or
  - b) with an employer, or other organisation, who is a direct or indirect competitor, customer or supplier of MTT.

***NB: If you should doubt whether a role could be classed as a possible conflict of interest, then you should disclose this.***

### **Disclosure of conflicts and potential conflicts of interest**

It is the responsibility of all employees, contractors, and others acting for and on behalf of the MTT to disclose any conflict of interest, or potential conflict of interest, promptly to Rob Jones or Craig Barwick.

This includes seeking the approval prior to taking part in financial, business, charitable or other activities which may pose any conflict of interest, or potential conflict of interest.

All employees, contractors and others engaged by the MTT are required to complete a Conflict of Interest Disclosure annually, as well as being responsible for disclosing any conflict of interest, or potential conflict of interest, that may occur in the intervening period promptly.

Disciplinary action may be taken in cases of failure to disclose any conflict of interest, or potential conflict of interest.

The Conflict of Interest Disclosure Declaration will be held on file in accordance with the Data Protection Act 2018. (GDPR)

### **Policy responsibility and review**

This policy and its procedures will be reviewed annually and revised if necessary, in response to customer and stakeholder feedback, changes in practice or legislation, to ensure it continues to meet our needs and those of our Qualification Regulators i.e., Awarding Organisations (NOCN Cskills Awards) , ESFA (Education & Skills Funding Agency) and external agencies and stakeholders.

Appendix 1

## Conflict of Interest - Annual Declaration

### 1. Individual Details

Full name	
Role	

### 2. Conflicts of Interest

This annual declaration is to ensure that any perceived, potential or actual conflicts of interest are appropriately highlighted in order to ensure they are managed to mitigate any Adverse Effects.

Further information can be found in the Multi Trades Training (MTT) Conflicts of Interest Policy.

Please select either A or B (by inserting an 'X' in the box). If B is selected, the details in the box below require completing:

<b>A - I do not have any perceived, potential or actual conflict/s of interest to declare</b>	<input type="checkbox"/>
---	--------------------------

<b>B - I have the following potential, potentially perceived or actual conflict/s of interest to declare</b>	<input type="checkbox"/>
<b><i>The type of interest</i></b>	
<b><i>The nature of the interest</i></b>	
<b><i>A description of all parties involved in the interest (financial or non-financial) and any other relevant information</i></b>	

I am aware that I remain under a continuing obligation to raise potential and / or actual conflicts of interest as they arise.

Should circumstances change after completion of this declaration, or new situations arise, I will promptly disclose the information to the Responsible Officers.

Signature	
Date	

### 3. Decision

The following section is to be completed by Multi Trades Training.

<b>No Declarations - Accepted</b>	
<b>Declarations Made – Accepted – No Actions Needed</b>	
<b>Declarations Made – Accepted – Actions Noted</b>	
<b>Declarations Made - Not Accepted – Next Steps Noted</b>	

This form and the information contained within it will be treated confidentially as far as is possible with information saved and shared only on a need to know basis and in line with the Data Protection Policy / Privacy Policy at MTT.