



# Conflict of Interest Policy

## Introduction

As an Independent Training Provider, MBKB is required to have in place a conflict of interest policy. This policy is to enable MBKB to identify, manage and mitigate conflict of interest. All staff, consultants and partners organisations have a responsibility to be aware of the potential for a conflict of interest.

## Purpose

The purpose of this policy is to protect our integrity as a business and the integrity of our qualifications. The policy is also designed to protect our staff by providing guidance on handling possible conflicts of interest that may arise as a result of MBKBs business as a Training Provider.

This policy:

- defines what is meant by conflict of interest
- describes the role of conflict of interest in the context of working for a training provider.
- sets out the responsibilities for managing conflict of interest

## Scope of policy

This policy applies to all staff, consultants and partner organisations that interact or potentially interact with the work of MBKB. This includes individuals involved with any aspects of the creation, marketing, sales, delivery, marking or any other activity connected with MBKBs Apprenticeships, qualifications, assessments, and supporting resources and services.

The individuals falling within the scope of this policy include directors, employees, contractors, home workers, agency workers and any associate staff.

## **Definition of conflict of interest**

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

Conflicts of interest can arise in a variety of circumstances relating to awarding organisation activity, for example:

- where the organisation has both a training delivery function and the final verification assessment function within one organisation
- when an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation
- when an individual has interests that conflict with his or her professional position where someone works for or carries out work on MBKB's behalf, but may have personal interests – paid or unpaid – in another business which either uses MBKB products or services, or produces similar products

## **Responsibility**

The ultimate responsibility for the Conflict of interest policy, dissemination of the policy and management of potential and actual conflicts of interest rests with the CEO.

## **Management**

Managers are responsible for communicating the Conflict of Interest Policy to all relevant individuals within their areas of responsibility annually.

1. All teams are required to review their procedures annually to ensure that they anticipate and manage potential or actual conflicts of interest.
2. Management meetings are required to give appropriate attention to potential or actual conflicts of interest.
3. Managers are responsible for ensuring that all new staff receive conflict of interest training.
4. Any potential or actual conflict of interest must be documented within Team Meetings/ 121's. The Manager must either resolve the issue or, for issues that cannot be resolved at this level, report the issue to the CEO.

NB All records are required to be available for audit purposes.

5. Individuals within MBKB have responsibility for ensuring that they are familiar with the Conflict of Interest Policy, any guidelines and complete any required conflict of interest training.
6. All individuals will be required annually to read and understand the Conflict of Interest Policy.
7. The most important feature of the policy is the requirement that an individual disclose any activity that might give rise to a potential conflict of interest. If there is any doubt whether or not it represents a conflict of interest report it!
8. The individual and Manager are equally responsible for ensuring that the issue is documented carefully.

9. An individual may wish to raise concerns relating to conflict of interest directly with the CEO. This may be done in confidence and they are entitled to receive a response to their concerns. NB individuals are protected under the company's Whistle Blowing Policy

10. Any staff member considering paid or unpaid work outside MBKB should inform their Manager if they think there is any potential for a conflict of interest. If the staff member is unsure whether a conflict of interest might arise, they should discuss this with their manager first. The Manager should speak to the CEO if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A staff member must not take on any such activities that could be deemed to compete or conflict with MBKB's activities.

### **Monitoring and escalation**

1. The CEO is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the business and, when necessary, to the Board of Governors.
2. The CEO will begin an investigation of any issues identified within 48 hours (In the CEO's absence the Quality Director will begin the investigation). A preliminary report will be made available to all concerned within 5 working days.

### **Advice and guidance**

Any required guidance or interpretation on potential conflicts of interest should be directed to the CEO.

### **Related Policies**

Whistle Blowing Policy

Malpractice Policy

Anti Bribery and Anti Fraud Policy

Name - Mark Bremner



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