

Conflict of Interest Policy

January 2022

Date approved: January 2022
Approved by: Head of Centre
Frequency of review: Biennially
Next review due: January 2024

1. Policy Objectives

The purpose of this policy to ensure that the integrity of Impact North West Ltd is protected and to ensure that in the event of a conflict of interest, what the relevant procedures are. This policy applies to all staff at Impact North West Ltd including but not limited to employees, verifiers and examiners, consultants and clients.

2. Definition

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.

The person responsible for managing conflicts of interest is the Head of Centre. The Head of Centre of Impact North West is responsible for communicating this policy to all staff involved in the examination process. The Head of Centre is also responsible for ensuring that all new staff receive conflict of interest training.

Potential or actual conflicts of interest are raised at departmental management meetings. Any potential or actual conflict of interest is logged with the Head of Centre. The Head of Centre must either resolve the issue or, for issues that cannot be resolved at this level, report the issue to the Board of Directors. All records are required to be available for audit purposes.

3. Examples of Conflict of Interest

The following is a list of examples of conflict of interest. This list is not exhaustive.

- A member of staff takes part in the negotiation of a commercial contract between the Centre and a company in which his/her family member is a Director.
- An unqualified relative is hired to provide services.
- A member of staff starts a company that provides services similar to Impact North West Ltd.
- Staff fail to disclose that they are related to a job candidate that Impact North West Ltd is considering hiring.
- Staff post to social media about company weaknesses, confidential or sensitive information.
- Staff offer paid services on company time to a customer or supplier.
- Staff work part-time at a company that is similar in service to Impact North West Ltd.
- Staff accepting payment from another company for information about Impact North West Ltd.
- Staff share confidential information about Impact North West Ltd with a competitor.
- Staff own all or part of a business that sells goods or services to Impact North West Ltd.
- Staff undertake business or work for a competitor.
- Staff share information in an interview about Impact North West Ltd activities or plans.
- Staff cash in on a business opportunity that Impact North West Ltd might have pursued.

4. Implementation of Policy

On commencement of employment, staff are required to complete a declaration of interest form. This is then completed by all staff on an annual basis to ensure that any potential conflicts are managed efficiently and effectively.

All staff are responsible for making sure that they are familiar with this policy, any guidelines and complete any mandatory conflict of interest training. Every year all staff must read the policy and confirm that they understand it. Individuals must report any activity that might create a potential conflict of interest. If there is any doubt whether it represents a conflict of interest it should be reported. The individual and Head of Centre are both responsible for documenting the issue carefully.

An individual may want to raise concerns relating to conflict of interest directly with the Head of Centre. This can be done in confidence and they are entitled to receive a response to their concerns. Any staff member considering paid or unpaid work outside Impact North West should inform the Head of Centre 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 the Head of Centre first. The Head of Centre should keep a record of the discussion. Staff should always notify Head of Centre of any changes.

A staff member must not take on any such activities that could be deemed to compete or conflict with Impact North West's activities. This policy was ratified in November 2021. This policy is due for review in November 2022.

Before each exam series all staff and other individuals must declare if any candidates being entered for exams with any particular exam board are family members, other relatives or friends of that exam board. This should be declared by completing a Declaration of Interest Form.

Any queries can be emailed to the Business Manager office@impactnorthwest.org.uk

5. Monitoring and Escalation

The Head of Centre is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the business and, when necessary, to the exam board and the regulatory authorities. Any issues identified will be investigated within 24 hours and will publish a preliminary report within five working days.