



Conflict of Interest Policy

Policy and Procedure

Introduction

This document provides guidance to stakeholders on handling possible conflicts of interest that may arise as a result of Opps' role as a training organisation. This policy applies to all staff, associates and other individuals whenever they interact or potentially interact with any of Opps functions.

This policy:

- defines what is meant by conflict of interest
- describes the role of conflict of interest in the context of working as an independent training provider
- sets out which conflicts can be managed and how they should be managed, and those which are considered unmanageable and therefore cannot be allowed
- illustrates potential conflict of interest situations, some of which are not obvious.

The most important feature of the policy is the instruction that individuals should always disclose an activity if there is any doubt about whether it represents a conflict of interest.

The policy describes how and when such disclosures should be made, that is, as soon as a potential or actual conflict is discovered. This should be done by completion of a report at the time (i.e. before the activity is carried out). The policy describes the procedures that should be followed and how to handle potential conflicts of interest.

Therefore this policy requires that:

- potential or actual conflicts of interest, once identified, are reported and dealt with immediately and effectively
- there is continual cross-company awareness-raising of the Conflict of Interest Policy through an annual training activity

Scope

This policy applies to all staff and other individuals who interact or potentially interact with the work of the organisation. This includes individuals involved with all aspects of the development, delivery and evaluation of training or any other activity connected with Opps business.

The content of the policy cannot cover every potential conflict and must be interpreted in the light of the particular circumstances of each case. (Where specific guidance, clarification and/or advice is sought on the interpretation of the policy, contact should be made with the Managing Director, Barbara Seymour.)

What is Conflict of Interest?

A simple definition of 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 awarding organisation activity, for example:

- an individual whose personal interests conflict with his/her professional position
- an employee who works for one company but who may have personal interests – paid or unpaid - that compete with his/her employment
- a person who has a position of authority in one organisation that conflicts with his or her interests in another organisation
- a person who has conflicting responsibilities
- an employee with friends or relatives taking Opps qualifications.
- when one part of the business creates and follows a procedure that conflicts with the awarding organisation's regulatory responsibilities.

The Role and Responsibilities of Individuals in Relation to Organisation Activities

All relevant staff and other relevant individuals have a responsibility to be aware of the potential for a conflict of interest. It is likely that staff working closely with Opps will encounter potential conflicts of interest from time to time.

Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact on the standards of, or public confidence in, the operations of Opps as a training organisation.

Staff can find themselves in potential conflict of interest situations because they are not clear on what the correct, auditable processes and procedures are for specific awarding organisation-related activity. Therefore it is necessary that all processes relating to high-risk activity are transparent and understood across the business.

Company Responsibility

1. **The ultimate responsibility for the management of potential and actual conflict of interest between Opps functions rests with the Directors.**
2. Senior management will communicate the Conflict of Interest Policy and procedures to all relevant and potentially relevant individuals on an annual basis. The required statement will be provided by the Operations Manager and will include a declaration that everyone should sign.
3. The Conflict of Interest Policy and procedures are a required component of the induction of all new and temporary staff and a necessary part of the training cycle for all contracted staff.
4. Procedures for all relevant departments should be reviewed annually to ensure they contain mechanisms that anticipate and manage potential conflicts of interest.
5. Operations and Quality Improvement meetings should give appropriate attention to potential conflicts of interest.
6. Any issues that arise should be documented and reported to the Managing Director

7. The Managing Director will begin investigating any issues referred to them by the Responsible Officer's office within 24 hours. A preliminary report will be made available within 5 working days.
8. The Managing Director will be responsible for deciding when and how matters relating to potential or actual conflicts of interest will be escalated within the business.

Individual responsibility

1. Every individual must read the Conflict of Interest Policy and procedures.
2. Any day-to-day concerns identified by an individual should be raised for the attention of their line manager and, as appropriate, in a team meeting.
3. Where there is a notified potential conflict of interest for an individual, the individual and line manager must document this carefully, together with those activities that must be avoided to prevent Opps and its operations being brought into disrepute. The document should be signed by both parties, brought to the attention of the Managing Director for sanction, and lodged within the Conflict of Interest policy file.
4. Any concerns that the individual feels are urgent should be communicated immediately to the Managing Director and may be done so in confidence. **It is an individual's right to raise concerns relating to conflict of interest directly with the Managing Director and to receive a response to their concerns. It should be noted that individuals are protected under the company's Whistle blowing Policy**
5. Any individual considering taking on additional paid work (either an employed or self-employed basis) must seek the Managing Director's agreement beforehand. They may not take on any such activities that could be deemed to compete or conflict with Opps activities.

Reporting

All potential and actual conflicts of interest will be recorded and logged within the Conflict of Interest file by the managing Director.

Investigations - when a conflict of interest breach is suspected - are carried out by the Managing Director

Opps Training and Development are committed to this policy. If you raise a genuine concern under this Policy, you will not be at risk of losing your job or suffering any form of retribution as a result. Provided you are acting in good faith, it does not matter if you are mistaken. Of course, the Company does not extend this assurance to someone who maliciously raises a matter they know to be untrue.

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Person responsible for policy and review	Managing Director