



Conflict of Interest Policy

Authorised by David MacGregor – Operations Director


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Scope

It is the policy of RM Training (UK) Limited that tutors and assessors acting on behalf of RM Training (UK) Limited must be free from conflicts of interest that could adversely affect their judgement or objectivity to the organisation in conducting business activities and assignments. RM Training (UK) Limited recognises that tutors and assessors may take part in legitimate financial, business, charitable and other activities outside of their centre roles, but any potential conflict of interest raised by those activities must be acknowledged, disclosed, and in relevant cases properly managed.

It is the responsibility of each individual to recognise situations in which they have a conflict of interest or might reasonably be seen by others to have a conflict; to disclose this conflict and to take such further steps as may be appropriate and set out in more detail under the procedure below.

Definition

A conflict of interest may generally be defined as a conflict between the official responsibilities of a tutor, assessor, and internal verifier and any other interests the particular individual may have and as such could compromise or appear to compromise their decisions.

Condition A4 in the Ofqual General Conditions of Recognition 2011 states that a conflict of interest exists in relation to an Awarding Organisation where:

The organisations interests in any activity undertaken by it, on its behalf, or by a member of its group have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications in accordance with its Conditions of Recognition

A person who is connected to the development, delivery, or award of qualifications by the awarding organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery, or award in accordance with the awarding organisations conditions of recognition

An informed and reasonable observer would conclude that either of the above situations was the case

Examples of Conflicts of Interests

It is not possible to provide a definitive list of examples of conflicts of interests, but the following are examples of situations that could lead to actual or perceived conflicts of interest:

Tutors and assessors working with a business outside of the approved Awarding Body centre that is in direct competition with them

Tutors and assessors participating in the appointment, promotion, supervision, or evaluation of a person with whom the person has close or familial ties

Tutors and assessors having a close or familial relationship with a registered learner, or learners' family whilst being involved in decisions about the outcome of their qualification

Tutors and assessors using non-public Awarding Body information or Awarding Body learner data for personal gain or advantage

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Tutors and assessors involved in the Centre approval processes, who own business consultancies offering qualifications or programmes.

The existence of such interests as those outlined above, does not necessarily imply conflict, but is likely to give an appearance of conflict and as such should be declared.

Process

It is the duty of all tutors and assessors to disclose any actual or potential conflict of interest, and the process for doing this is documented below:

All tutors and assessors are issued with a conflict of interest form to complete on commencement with the RM Training (UK) Limited and it is a requirement of their contract that this is completed and updated on an annual basis.

The information held on the conflict of interest form is then transferred to a register of interest's document which is maintained by the operations manager at the RM Training (UK) Limited

If the individual concerned has any changes to their declared circumstances, they must inform their line manager immediately in writing, so that the conflict of interest can be evaluated, and the register updated

The form is to be completed even when the individual has no conflict of interest to declare.

The information submitted is then evaluated to identify if any further action is required and a written record of the outcome of the evaluation is kept.

Action

Most situations require no further action than the completion of the conflict of interest form. In some instances, however, the information declared on the form will require some follow up action, in order for the conflict of interest to be managed appropriately.

The approach agreed between the line manager and the tutor and assessor, will be documented and held with the conflict of interest forms.

Examples of actions that could be taken

Individual not taking part in discussions or decisions of certain matters

Referring certain matters for decision to others with no vested interest

Agreeing not to be involved in a particular project or with a particular centre

Declaring an interest when it is appropriate to do so

Referring the matter to the Awarding Body for advice and guidance.

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Policy Review Frequency

RMT review and amend this statement regularly to ensure that it meets legislation and remains effective. The updates to this policy are published to our learners, employees, and workplace providers by the regular distribution of electronic newsletter via email as well as appearing on our company website.

Equality & Diversity

Customers have the right to express dissatisfaction with the services they receive from RM Training. (UK) Limited. Customers using this policy can expect to be treated fairly and without discrimination.

Suggestions for Improvement

If you have any suggestions for improvement within this policy, then please feel free to offer these suggestions to the Office Administrator (admin@rmtraining.co.uk)

Monitoring and Evaluation

This policy will be part of RM Training's procedure of reviewing all policies every year. However, more immediate changes will be brought to the attention of the Senior Management Team as necessary. Day to day implementation of this policy will be reviewed through regular staff meetings.

Reporting and Concerns

All queries and concerns about Conflict of Interest should be referred to the RM Training Managing Director James MacGregor (james.macgregor@rmtraining.co.uk).

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