

Conflict of Interest Policy

Tutors, Assessors and Internal Verifiers

It is the policy of SFJ that tutors and assessors acting on behalf of an SFJ approved centre or SFJ recognised provider must be free from conflicts of interest that could adversely affect their judgement or objectivity to the organisation in conducting business activities and assignments. SFJ recognises that tutors and assessors may take part in legitimate financial, business, charitable and other activities outside of their SFJ approved centre and SFJ recognised provider 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.

SimTrainer UK seeks to work at all times to these guidelines.

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 bodies 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 an SFJ registered learner, or learners' family whilst being involved in decisions about the outcome of their qualification
- Tutors and assessors using non-public SFJ information or SFJ learner data for personal gain or advantage
- Tutors and assessors involved in the SFJ Centre approval processes, who own business consultancies offering SFJ 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 working for SimTrainer UK 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 organisation 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 interests document which is maintained by a designated person: *John Lord*

- 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 SFJ for advice and guidance.

This policy shall be the subject of a three-year review cycle or as necessary.

Conflict Of Interest Disclosure Form

It is the policy of SimTrainer UK to address how issues of actual, potential and perceived conflicts of interest involving tutors and employees of SimTrainer UK should be identified, disclosed and managed. This form is designed to identify and disclose known conflicts in an effort to properly manage them.

I have read SimTrainer UK Conflict of Interest policy and understand that as a member of staff at SimTrainer UK it is my obligation to act in a manner which promotes the best interests of SimTrainer UK and to avoid conflicts of interest when making decisions and taking actions on behalf of SimTrainer UK.

My answers to this disclosure form are correctly stated to the best of my knowledge. Should a possible conflict of interest arise in my responsibilities, I recognise that I have the obligation to notify, based on my position, the appropriate designated individual and to abstain from any participation in the matter until the company can determine whether a conflict exists and how that conflict shall be resolved. If any relevant changes occur in my affiliations, duties, or financial circumstances, I recognise that I have a continuing obligation to file an amended "Conflict of Interest Disclosure Form" with the appropriate designated office.

I understand that the information on this form is solely for use by SimTrainer UK and is considered confidential information. Release of this information within will be on a need-to-know basis only. Release to external parties will be only when required by law.

Signature

Date

Please complete the following questions and submit this form to the Operations Manager of SimTrainer UK.

1. Are you, or a member of your immediate family, an officer, director, trustee, partner (general or limited), employee or regularly retained consultant of any company, firm that presently has business dealings with or which might reasonably be expected to have business dealings with SimTrainer UK in the coming year:

Yes No

If yes, please list the name of the company, firm or organisation, the position held, and the nature of the business which is currently being conducted with or which may reasonably be expected to be conducted with SimTrainer UK in the coming year:

2. Do you or does any member of your immediate family have a financial interest, direct or indirect, in a company, firm or organisation which currently has business dealings with SimTrainer UK, or which may reasonably be expected to have such business dealings with SimTrainer UK in the coming year:

Yes No

If yes, please list the name of the company, firm or organisation, the nature of the interest and the name of the person holding the interest, and the nature of the business which is currently being conducted with the University or which may reasonably be expected to be conducted with SimTrainer UK in the coming year:

3. Do you or does any member of your immediate family have a financial or personal interest in an entity in which SimTrainer UK has a financial or other vested interest.

Yes No

If yes, please provide details below:

4. Have you or an immediate family member accepted gifts, gratuities, lodging, dining, or entertainment that might reasonably appear to influence your judgment or actions concerning the business of SimTrainer UK:

Yes No

If yes, please provide details below:

5. Do you have any other interest or role in a firm or organisation, where that interest or relationship might reasonably be expected to create an impression or suspicion among the public having knowledge of your acts that you engaged in conduct in violation of your trust as a trustee, officer, faculty or staff member:

Yes No

If yes, please provide details below:

Please add additional pages as needed.

If any material changes to the responses provided on this disclosure form occur, the trustee, officer or employee is required to update the information on this form in writing and submit the update to the Manager of SimTrainer UK.

Form reviewed by:

Remedial Action(s) to be taken:

SimTrainer UK will follow-up on all recommended actions to ensure compliance.