



BUXTON TRAINING ENTERPRISES™
EXCELLENCE THROUGH EDUCATION AND EXPERIENCE

CONFLICT OF INTEREST POLICY AND PROCEDURES

1. Introduction

Buxton Training Enterprises Ltd (BTE) have a good reputation as a successful and high quality Alternative Provision in Nottinghamshire. As BTE work with a number of awarding bodies, schools and students we are required to have in place a conflict of interest policy that enables us to identify and manage conflict of interest.

2. Purpose

The purpose of this policy is to provide guidance to relevant individuals on handling possible conflicts of interest that may arise as a result of BTE's role as an Alternative Education. This policy applies to all staff and other individuals whenever they interact or potentially interact with any of BTE's organisation functions. This policy: defines what is meant by conflict of interest, describes the role of conflict of interest in the context of working with, or for, an awarding organisation and sets out the roles and responsibilities for managing conflict of interest at each level in the organisation. Separate guidance illustrates potential conflict of interest situations, some of which are not obvious.

3. Scope

The policy covers individuals falling within scope of this policy include directors, employees, contractors, home workers, agency workers and any associate staff, including assessment associates, verifiers/examiners and freelance staff. This policy particularly applies to all staff and other individuals who interact or potentially interact with the work of the centre.

4. Definition of conflict of interest

A 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 any activity, for example: where the training delivery function and the awarding function rest within one umbrella organisation, when an individual has a position of authority in one organisation which conflicts with his or her interests in another organisation, when an individual has personal interests that conflict with his/her professional position, where someone works for or carries out work on BTE's behalf, but who may have personal interests – paid or unpaid, where someone works for or carries out work on BTE's behalf, who has friends or relatives taking assessments or examinations.

5. Roles and Responsibilities

All relevant staff and other individuals have a responsibility to be aware of the potential for a conflict of interest. It is likely that individuals working closely with BTE 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, regulated units and qualifications.

Company Level – responsibility of Managing Director

The ultimate responsibility for the management of potential and actual conflicts of interest rests with the Managing Director.

The Managing Director is responsible for communicating the Conflict of Interest Policy to all relevant individuals within their areas of responsibility on an annual basis. All relevant individuals will be required annually to sign a declaration that they have read and understand the Conflict of Interest Policy.

The Managing Director is responsible for ensuring that conflict of interest training of all staff takes place, including as part of induction.

The Managing Director is responsible for ensuring that audits are carried out to test understanding and implementation of the Conflict of Interest Policy. Audits will include all areas and in particular where there are interactions between Pearson's awarding organisation functions and its commercial functions.

All Directors are responsible for reporting all actual or potential conflict of interest. The Director is responsible for deciding when and how matters relating to potential or actual conflicts of interest will be escalated within the business, including when they are reported to the Managing Director.

All relevant staff are required to review their procedures annually to ensure that the procedures contain mechanisms that anticipate and manage potential conflicts of interest. The Managing Director is responsible for ensuring that all new staff receive conflict of interest training.

Where there is a potential or actual conflict of interest these are required to be documented.

The Director must either resolve the issue or, for issues that are not resolvable (for example, staff who are also external verifiers) report the issue to the Managing Director. The Managing Director will begin an investigation of any issues identified by the Director within 24 hours. A preliminary report will be made available to the Managing Director within 5 working days

Every individual within BTE has responsibility for ensuring that they are familiar with the Conflict of Interest Policy and any guidelines.

The most important feature of the policy is the requirement that an individual disclose any activity if there is any doubt whether or not it represents a conflict of interest: if in doubt, report it!

It is an individual's responsibility to ensure that they take part in conflict of interest training.

Where there is a potential or actual conflict of interest the individual and Director are responsible for ensuring that the issue is documented carefully. The Director must either resolve the issue or escalate it to the Managing Director. All records are required to be available for audit purposes.

An individual is required to communicate any issue s/he feels is urgent immediately to the Director. This may be done in confidence. It is an individual's responsibility to raise concerns relating to conflict of interest directly with the Programmes Manager and the individual is entitled to receive a response to their concerns. It should be noted that individuals are protected under the company's Whistle blowing Policy.

Any individual considering taking on additional paid work (on either an employed or self employed basis) or voluntary work outside Pearson must seek their Managing Director's written agreement beforehand. An individual must not take on any such activities that could be deemed to compete or conflict with BTE's activities.