SIGTA LTD

Conflict of Interest Policy

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Date	Version	Description	Checked	Approved
15-01-26	2.0	Annual review of this policy review completed. Minor updates to format and content (format). Introduction of version control table to record amendments made.	Mike Driscoll IQA - SIGTA	Alison Foxwell CEO -SIGTA

Next revision due: 15-01-27

Conflict of Interest Policy

Purpose

This policy outlines SIGTA's intention to identify and monitor all potential or actual conflicts of interest that may adversely affect the integrity of the organisation, the delivery of SIGTA services and/or the delivery of apprenticeships and qualifications.

This policy will help staff at all levels to identify potential or actual cases of conflict of interest and define how to appropriately manage them.

Responsibility

This policy applies to any person who carries out any role or activity, for or on behalf of SIGTA Limited.

This includes:

- Directors and Trustees
- All SIGTA staff
- External contractors

Definition

A conflict of interest exists where either SIGTA or an individual to whom this policy applies has competing interests or loyalties in the same matter.

Examples of Conflict of Interest (This is not an exhaustive list):

- When an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation.
- Where an individual is undertaking the assessment of learners and has previously trained, managed or assessed the same learners.
- A trainer, assessor or quality assurer delivering qualifications, where a family member/friend is one of the learners.
- SIGTA's interest in any activity that could potentially lead SIGTA to act contrary to its stated objectives in the development and delivery of its products and services.
- When an individual has interests that conflict with his or her professional position.
- Where an individual works for or carries out work on SIGTA's behalf, but may have personal interests (paid or unpaid) in another business which either uses SIGTA's services, or provides similar services.

Conflicts of interest can:

- Inhibit free discussion.

- Result in decisions or actions that are not in the interests of SIGTA, staff, learners, member organisations, non-member employers and third party external organisations, such as the ESFA or awarding bodies.
- Put at risk SIGTA's reputation as a result of actual or perceived impropriety.

A conflict of interest can appear in the form of:

- Direct financial gain.
- Indirect financial gain e.g. a service or contract is awarded to a relative or friend.
- Non-financial gain when the beneficiary of a service, award or benefit is an employee, contractor or Director/Trustee. This can also extend to relatives and friends.

Identifying Conflicts of Interest

All stakeholders within the scope of this policy must actively consider and notify SIGTA's CEO when a conflict of interest or perceived conflict of interest exists or may arise. If the conflict of interest (actual or perceived) relates to any SIGTA Director or Trustee, this must be notified to the SIGTA Chairperson and presented to the Board for discussion and resolution. Such discussion and resolution will be recorded in the minutes of the meeting.

The following are required of Directors/Trustees, employees and contractors engaged to deliver services on behalf of SIGTA:

- A commitment to identifying and managing all actual and potential conflicts of interest that may affect the effectiveness, quality, integrity, statutory compliance or reputation of SIGTA. If in any doubt a conflict of interest (actual or potential) must be declared.
- A recognition that managing conflicts of interest is about preventing issues from occurring that could impact on the operational effectiveness, ethical operation and regulatory compliance of SIGTA.
- A recognition that conflicts of interest must be declared and recorded in writing as soon as the individual becomes aware of the actual or potential conflict.

Dealing with conflicts of interest

- The conflict of interest must be notified to the CEO using the Conflict of Interest Declaration Form (See appendix 1). In the case of a conflict of interest involving the CEO or other Director/Trustee, this will be notified in writing to the SIGTA Chairperson.
- Records relating to actual or potential conflicts of interest and the agreed resolution will be retained by the CEO and held for a minimum of 7 years following closure of the event or circumstance that gave rise to the actual or potential conflict of interest. If the CEO or other Directors/Trustees are involved the event will be reported by the Chairperson to the Board and details recorded in the meeting minutes.
- If an individual has any changes in circumstance that alter or impact on a previously declared conflict of interest they must notify the relevant person, as defined above, and records must be updated to reflect the change and action taken
- It may be necessary for the Centre to contact Award Organisations to share information regarding potential conflicts of interest.

- All actual or potential conflicts of interest, not involving the SIGTA CEO or Directors/Trustees, will be evaluated by the CEO. The CEO will consult internally and externally as required to determine if any additional action or monitoring is required. If the conflict of interest relates to the CEO or other Director/Trustee, the SIGTA Board will evaluate the situation and agree appropriate action if required.
- Where an identified conflict of interest relates to an individual or organisation external to SIGTA, the SIGTA CEO will take the necessary action to communicate the situation and resolution to the party involved.
- If an identified conflict of interest is required to be reported to a regulatory authority, the ESFA, awarding bodies or other applicable authorities, the CEO will undertake this action in compliance with contract terms or other defined reporting procedures.
- SIGTA will not operate payment by achievement systems for employees and contractors involved in learning delivery, assessment and quality control functions.

It should be noted that many situations will not require any further action beyond the completion of the conflict of interest disclosure form. By following the process defined above, SIGTA, its employees, learners, members, employers and relevant regulatory bodies can be assured that any conflict or potential conflict of interest is appropriately managed.

Examples of actions that could mitigate conflicts of interest

- An individual not taking part in a decision that creates the actual or potential conflict of interest.
- Agreeing that a member of staff or contractor will not be involved in the delivery of a product or service to a specified individual or group.
- Ensuring that employees involved in the learning delivery and assessment process are not incentivised based on learner qualification outcomes and volumes.
- Providing independent oversight and scrutiny of activities and outcomes.

Confidentiality and whistle blowing

In some case a perceived conflict of interest may be reported by a third party who wishes to remain anonymous. Although it is always preferable to know the identity and contact details of the informant, it is recognised that some individuals could fear adverse consequences as a result of being identified. The Chief Executive will take such concerns into consideration and will take appropriate action to protect the identity of the informant, as far as this is lawfully allowed.

Issues reported anonymously will always be thoroughly investigated to determine if a conflict of interest exists and to ensure appropriate action can be taken to address the situation.

External Factors

It is recognised that some contracts entered into by SIGTA require additional measures in relation to the management and reporting of conflicts of interest. Where such contracts require additional measures, these will be applied alongside SIGTA's policy and will take precedence in the event of a conflicting terms.

Actions to Implement and Develop this Policy

SIGTA's Management will introduce new members of staff to this policy and promote its use during staff meetings and training sessions.

Staff CPD and training

SIGTA is committed to ensuring that all staff members are equipped with the knowledge and tools necessary to identify, disclose, and manage conflicts of interest. We recognise that "conflicts" are often unavoidable in a professional environment; therefore, our training focuses on transparency and risk mitigation rather than prohibition.

SIGTA is committed to maintaining a culture of integrity, we provide training to employees on their roles and responsibilities:

- **Mandatory Induction:** All new employees, contractors, and board members must complete a Conflict of Interest declaration on joining the organisation.
- **Annual Refreshers:** All staff are required to participate in an annual training update to stay informed of changes in legislation, industry standards, and internal reporting procedures.

We encourage staff to treat ethical decision-making as a core professional competency. Participation in Conflict-of-Interest training will be recorded as part of each employee's CPD record.

Review Arrangements

This policy will be reviewed annually. Updates will be made to reflect best practice and current requirements.

Appendix One

Conflict of Interest Declaration Form

SIGTA Conflict of Interest Declaration Form

Confidential (When completed)

Name:	
Position:	
Date first aware of conflict or potential conflict:	

Conflict of interest (Actual or Potential)
Describe the conflict of interest or potential conflict of interest that you need to report. Provide as much detail as possible including dates and, where applicable, include the names of individuals and organisations impacted by or involved in the conflict or potential conflict of interest. (Continue on a separate sheet if required. Reference additional sheets on this form)

Number of additional sheets used (or mark N/A):	

Declaration

I confirm that the above details of my private interests (or my organisation's interests) are to the best of my knowledge correct. I agree to inform SIGTA of any material changes that impact on the information provided in this declaration.

Signed: ________________________________

Date: ____________