



CONFLICT OF INTEREST POLICY

EFFECTIVE DATE : 22 SEPT 2013

REVIEWED BY : QUALITY MANAGER

NEXT REVIEW : NOVEMBER 2023

POLICY NUMBER : QA-T89

Scope and purpose of the Policy

For the purpose of this policy a conflict of interest is defined as a situation in which an individual, or organisation, has, or may be perceived to have –

competing interests or loyalties which could lead to a potentially subjective, biased or corrupt decision being made by that individual or organisation.

UK VERSITY recognise and encourage the promotion of building successful business and external relationships. In doing so, we are mindful that there may be situations when a perceived or potential conflict of interest may arise and that we have a duty to identify, manage and mitigate potential conflicts of interest. As such where a potential conflict may be identified we will follow the procedure outlined in this document.

This policy applies to all individuals working for or on behalf of UK VERSITY, including all colleagues at all locations and at all levels including members of the Board, the Executive Team, part time members of staff, partners, satellite centres, any associates, any subsidiaries or their employees or any other person associated with us (collectively referred to in this document as 'individuals').

This policy extends to all of UK Versity's dealings and transactions in all locations in which it operates. This policy covers conflicts of interest for the awarding bodies which UK Versity represents

This policy sets out the responsibilities on all individuals, in line with their contract of employment (or other contractual arrangement), in supporting us to meet the requirements set out by the awarding bodies.

This policy and associated procedure supports us in ensuring that working relationships with colleagues, partners and customers do not conflict with our requirement to engage in business relationships in a legal, transparent, ethical and responsible manner.

UK Versity recognises that conflicts of interest may arise that could lead to individuals making decisions, or appearing to make decisions, that are based on personal interest and not the interest of the organisation or what is ethically correct. Such conflicts of interest may also constitute a form of corruption

Linked Policies

The policy should be read in conjunction with

- Anti-Bribery and Corruption Policy
- Whistleblowing Policy.

Conflicts of Interest Guidelines

1. Risk management in relation to conflicts of interest

Assessing the risks to UK Versity arising from potential conflicts of interest is an integral part of UK Versity's overall and ongoing risk management process. Identified conflicts of interest are mitigated as far as possible, and are monitored as part of overall risk management and internal control processes. Periodic reviews of our conflicts of interest policy and procedures are undertaken as part of our governance and accountability processes. All existing and reasonably foreseeable conflicts of interest will be identified and monitored by our organisation in line with this procedure and escalated to an Executive Member where appropriate. Documented conflicts of interest will be monitored closely, particularly during periods of change, in order to mitigate the possible impact of any potential Adverse Effect, as specified in our regulators' Conditions of Recognition.

2. Prevention of conflicts of interest within UK Versity

No colleague within the UK Versity shall provide or accept preferential treatment (including discounts on services) to or from any colleague or any other part of UK Versity, where such a transaction may adversely affect the business; learners, centres or other relevant parties. Such actions may also be construed as bribery and may be subject to criminal prosecution.

3. Roles and responsibilities

To assist us in managing significant risks with regards to potential conflicts of interest, individuals must tell us about any relevant risk and/or issue in relation to a conflict of interest (or potential conflict) that has come to their attention.

We appreciate that they may wish to do so in confidence and are asked to refer to our Whistleblowing policy (available on our website or on the company intranet) for more information. Any person or body employed by, or acting on behalf of UK Versity is personally responsible for ensuring that they adhere to the policy and procedures in this document.

4. Illustrations of potential conflicts of interest

Conflicts of interest can arise in a variety of circumstances in relation to our business activity. These could include, but are not limited to the following illustrations:

- When an individual has a position of authority in any part of UK Versity which conflicts with his or her interests in an organisation.
- When an individual has a position of authority in UK Versity which conflicts with his or her interests.
- When an individual has personal interests or relationships that conflict with his/her professional position.
- Where an individual works for or carries out work on UK Versity's behalf, but who may have personal interests, paid or unpaid, in another business which either uses UK Versity's products or services, or produces similar products to those of UK Versity or any of its awarding bodies.
- Where an individual takes on additional paid work (on either an employed or self-employed basis) or voluntary work outside UK Versity which conflicts with the work of UK Versity or any of its awarding bodies.
- Where an individual receives payment for some work they do for the company or business, unless the payment complies with the relevant clauses of UK Versity's Memorandum and Articles of Association (available from the Personal Assistant to the Chief Executive). Specifically, in relation to UK Versity's Awarding organisation, the following conflicts of interest could also arise:

- Where an individual works for or carries out work on UK Versity's behalf, who has friends or relatives taking NCFE assessments and/or examinations.
- When one part of UK Versity creates and follows a procedure that conflicts with Awarding's regulatory responsibilities as a regulated Awarding Organisation.

How to contact us

If you have a concern or query about conflicts of interest you can contact us via phone or email. Quality Improvement, Risk and Compliance Team (qa@ukversity.co.uk) who may be contacted at:

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