

## **Conflict of Interest Policy**

### **Purpose**

The purpose of this policy is to provide guidance to all staff and representatives of GEM Compliance Training Ltd. on managing possible conflicts of interest that may arise as a result of GEM Compliance Training Ltd. role as a training provider.

### **Policy**

- Define what is meant by conflict of interest.
- Set out the roles and responsibilities for declaring and managing a conflict of interest.
- Provide examples of potential conflict of interest situations.

It is the policy of GEM Compliance Training Ltd. that any individual or organisation acting on their behalf must declare actual, potential or perceived conflicts of interest that could adversely affect their judgement or objectivity to the organisation when conducting business activities.

### **Definition of conflict of interest**

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties, or there is the potential for this situation to arise.

Examples include:-

- 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 an individual works for or carries out work on behalf of GEM Compliance Training Ltd. which includes any friend or family member who does not normally work for or represent GEM Compliance Training Ltd. Tutors, assessors or other representatives of the business working for or with a business outside of GEM Compliance Training Ltd. that is in direct competition with them.
- Tutors and assessors having a close relationship with a learner or learners' family whilst being involved in decisions about the outcome of their accreditation or qualification.
- Tutors and assessors using personal or company data information for personal gain or advantage.




### Roles and responsibilities

All relevant staff and other individuals representing GEM Compliance Training Ltd. have a responsibility to be aware of the potential for a conflict of interest. Any conflicts of interest, perceived or otherwise, will be declared to the head of centre. The head of centre will either deal directly with the conflict or allocate responsibility to a nominated individual who is completely independent of the declared conflict.

### Action

All declarations of a conflict of interest will be recorded in a conflict of interest log. In many cases this will suffice. In some instances, however, the information declared in the log will require some follow up action for the conflict of interest to be managed appropriately. The approach agreed between the head of centre and the individual declaring the conflict will be documented and held with the conflict of interest log.

### **This policy has been approved & authorised by:**

**Name:** Gavin Milligan  
**Position:** Managing Director  
**Date:** 01/12/2022  
**Signature:** 

### Revisions

Version	Date Created	By	Reason for change
1	1 <sup>st</sup> Dec 2018	Gavin Milligan	New document
2			
3			
4			