



## ThinkTalent Conflict of Interest Policy

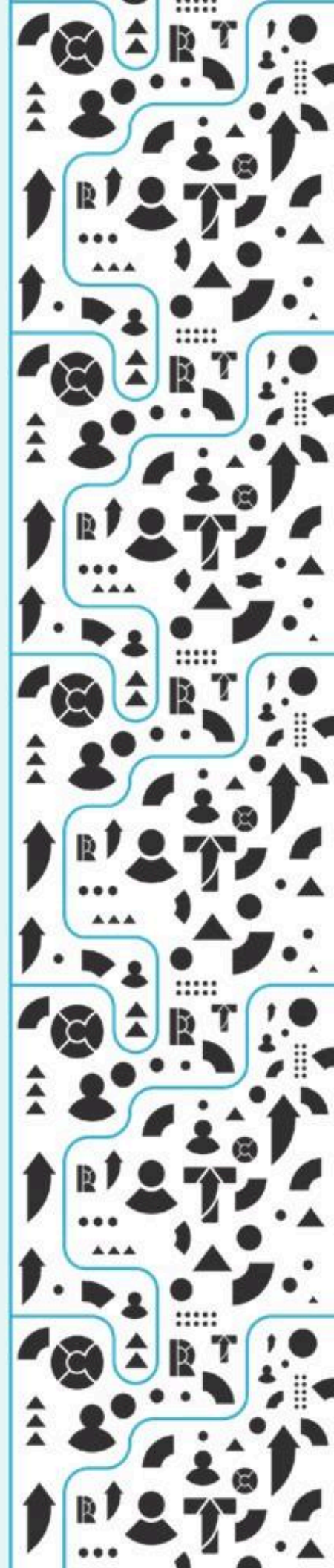
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Think Talent Institute

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## 1. Purpose

ThinkTalent is committed to conducting all of its activities with integrity, impartiality and transparency. This policy establishes the principles and procedures for identifying, declaring and managing actual, potential or perceived conflicts of interest to protect the integrity of our training, assessment and business operations.

The policy supports ThinkTalent's commitment to:

- fair and objective learner assessment;
- equal treatment of learners and staff;
- ethical business practices;
- compliance with the requirements of awarding organisations, MFHEA and other applicable regulatory bodies.

## 2. Scope

This policy applies to everyone acting on behalf of ThinkTalent, including:

- Chief Executive Officer (CEO)
- Executive Director
- Directors
- Managers
- Administrative staff
- Trainers and Tutors
- Tutors/Assessors
- Internal Quality Assurers (IQAs)
- Consultants
- Contractors
- Freelance associates
- Anyone involved in learner recruitment, assessment or certification.

## 3. Definition of a Conflict of Interest

A conflict of interest exists where an individual's personal, financial or professional interests could influence, or appear to influence, the impartial performance of their duties.

Conflicts may be:

- Actual – the conflict currently exists.
- Potential – circumstances could lead to a conflict in the future.
- Perceived – others could reasonably believe a conflict exists, even if none actually does.

The appearance of a conflict can be just as damaging as an actual conflict and should therefore be declared.

## 4. Examples of Conflicts of Interest

Examples include, but are not limited to:

### Learner Assessment

- Assessing or internally verifying work produced by a family member, close friend or business associate.
- Delivering training to a learner where impartial assessment cannot be guaranteed.
- Providing private tuition to learners enrolled on ThinkTalent programmes without prior approval.

### Recruitment and Employment

- Participating in the recruitment or promotion of relatives or close friends.
- Supervising someone with whom there is a close personal relationship.

### Procurement

- Selecting suppliers owned or managed by family members or friends.
- Receiving gifts, hospitality or incentives that could influence purchasing decisions.

### Outside Employment

- Working for another organisation whose activities compete with or conflict with ThinkTalent.
- Using ThinkTalent resources for personal business activities.

### Financial Interests

- Having a financial interest in organisations providing services to ThinkTalent.
- Receiving commissions or personal benefits arising from ThinkTalent business decisions.

## 5. Responsibilities

### All Employees and Associates

Every individual must:

- act honestly and impartially;
- identify any actual, potential or perceived conflicts;
- declare conflicts as soon as they become aware of them;
- cooperate with any measures introduced to manage the conflict;
- avoid participating in decisions where impartiality may be compromised.

### Chief Executive Officer

For the purposes of this policy, the CEO and Executive Director are distinct roles and the titles are not interchangeable. The CEO reviews and manages individual conflict declarations as set out below; the Executive Director has overall responsibility for policy implementation and the Conflict of Interest Register. 'Directors' refers to persons formally holding a Director position and does not, by itself, mean that they hold either executive role.

The CEO is responsible for:

- reviewing conflict declarations;
- determining appropriate mitigating actions;
- maintaining appropriate records;
- monitoring ongoing conflicts.

### Executive Director

The Executive Director is responsible for:

- ensuring this policy is implemented;
- maintaining the Conflict-of-Interest Register;
- ensuring appropriate action is taken where conflicts arise;
- reviewing this policy annually.

## 6. Declaring a Conflict of Interest

Individuals must declare any conflict as soon as it becomes known.

Declarations should include:

- nature of the conflict;
- people involved;
- activities affected;
- proposed mitigating actions (if known).

Declarations should normally be submitted to the individual's Line Manager. They may be submitted directly to the CEO where the Line Manager is involved in the matter, where escalation is appropriate, or where confidentiality or impartiality requires an alternative route.

## 7. Managing Conflicts

Each declared conflict will be assessed according to:

- likelihood of influencing decisions;
- impact on learners or business operations;
- reputational risk;

- legal or regulatory implications.

Possible management actions include:

- removal from decision making;
- allocation of alternative assessors or trainers;
- independent verification;
- increased monitoring;
- reassignment of duties;
- withdrawal from the activity.

All decisions will be recorded in the Conflict of Interest Register.

## 8. Confidentiality

Information disclosed under this policy will be handled confidentially and processed in accordance with ThinkTalent's Data Protection Policy and applicable data protection legislation.

Only individuals who require the information to manage the conflict will have access to it.

## 9. Failure to Declare a Conflict

Failure to disclose an actual or potential conflict of interest may result in:

- disciplinary action;
- removal from assessment or verification duties;
- termination of consultancy or contractor agreements;
- notification to awarding organisations or regulatory authorities where required.

## 10. Monitoring and Review

This policy will be reviewed annually or sooner where:

- regulatory requirements change;
- awarding organisation (e.g. MFHEA, OTHM etc.) requirements are updated;
- significant organisational changes occur;
- lessons learned from investigations require amendments.

## Appendix A

### Conflict of Interest Declaration Form

Register / Reference Number: \_\_\_\_\_

#### Personal Details

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Department: \_\_\_\_\_

Date: \_\_\_\_\_

#### Nature of Conflict

Please describe the actual, potential or perceived conflict of interest.

#### Individuals or Organisations Involved

#### Activities Affected

- ☐ Recruitment
- ☐ Training Delivery
- ☐ Assessment
- ☐ Internal Quality Assurance
- ☐ Procurement
- ☐ Financial Decisions
- ☐ Other \_\_\_\_\_

**Proposed Mitigation (if known)****Declaration**

I declare that the information provided above is accurate to the best of my knowledge.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Management Decision****Conflict Confirmed?**

☐ Yes

☐ No

**Risk Level:**

☐ Low

☐ Medium

☐ High

Management Action: \_\_\_\_\_

Approved by: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_



Document Title: Conflict of Interest Policy

Document Owner: Executive Director

Applies to: All employees, trainers, assessors, IQAs, consultants, contractors, the Chief Executive Officer (CEO), the Executive Director and Directors

