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| **Quality Nominee** | **Rumiana Bahova Nuseibeh** | **Revision Due date:** | **9/11/2024** |





**Conflict of Interest Policy**

**This Document was last revised : 9th November 2023**

**HTU** key role is to secure standards for all its offered programmes and qualifications and its certificates. As part of our commitment to quality assuring standards and therefore protecting learners, HTU provides guidance and support to help HTU and their learners achieve their goals.

HTU regulatory policies are integral to Pearson approach and articulate in a consistent way how we meet our **regulatory requirements**. They are reviewed annually to ensure that they remain fit for purpose.

**1. Introduction**

HTU is required by the awarding organisation to have in place a **conflict of interest**

**policy** that enables us to identify. All relevant staff and other individuals have a responsibility to be aware of the potential for a conflict of interest.

**2. Purpose**

The purpose of this policy is to protect the integrity as a business and the integrity of the qualifications. The policy is also designed to protect our staff by providing guidance on handling possible conflicts of interest that may arise as a result of our role.

**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

\_ sets out the responsibilities for managing conflict of interest at each level in the organisation.

**3. Policy scope**

This policy applies to all staff and other individuals who interact or potentially interact with the work of the awarding organisation. This includes individuals involved with any aspects of the creation, marketing, sales, distribution, marking or any other activity connected with HTU’s qualifications, tests and assessments, and supporting resources and services.

The individuals falling within the scope of this policy include directors, employees, contractors, home workers, agency workers and any associate staff, including assessment associates, verifiers/examiners and freelance staff.

**4. Definition of conflict of interest**

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

***Conflicts of interest can arise in a variety of circumstances relating to awarding organisation 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 that conflicts with his or her interests in another organisation

\_ When an individual has interests that conflict with his or her professional position

\_ Where someone works for or carries out work on HTU’s behalf, but may have personal interests – paid or unpaid – in another business which either uses luminous products or services, or produces similar products

\_ Where someone works for or carries out work on HTU’s behalf, who has friends or relatives taking HTU assessments or examinations

\_ When one part of HTU creates and follows a procedure that conflicts with HTU’s regulatory responsibilities as an awarding organisation.

**5. Responsibilities**

**5.1 The Board**

The ultimate responsibility for the Conflict of interest policy, dissemination of the policy and management of potential and actual conflicts of interest rests with the HTU Board.

**5.2 Senior management**

Managers in each Division are responsible for communicating the Conflict of Interest Policy to all relevant individuals within their areas of responsibility annually.

**5.3 Divisional/departmental responsibility of directors and their senior managers**

1 All departments are required to review their procedures annually to ensure that they anticipate and manage potential or actual conflicts of interest.

2 Divisional and departmental management meetings are required to give appropriate attention to potential or actual conflicts of interest.

3 Line managers are responsible for ensuring that all new staff receives conflict of interest training.

4 Any potential or actual conflict of interest must be documented within the Division or Department. The line manager must either resolve the issue or, for issues that cannot be resolved at this level, report the issue to their Director and/or the Responsible Officer .All records are required to be available for audit purposes.

**5.4 Individual responsibility**

1. Individuals within HTU have responsibility for ensuring that they are

familiar with the Conflict of Interest Policy and any guidelines.

2. All individuals will be required annually to read and understand the Conflict of Interest Policy.

3. The most important feature of the policy is the requirement that an individual disclose

any activity that might give rise to a potential conflict of interest

4. The individual and line manager are equally responsible for ensuring that the issue is documented carefully.

5. An individual may wish to raise concerns relating to conflict of interest directly with the

Responsible Officer’s. This may be done in confidence and they are entitled to receive a response to their concerns.

6. Any staff member considering paid or unpaid work outside HTU should inform their manager if they think there is any potential for a conflict of interest. If the staff member is unsure whether a conflict of interest might arise, they should discuss this with their line manager first. The line manager should contact the conflict of interest inbox if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A staff member must not take on any such activities that could be deemed to compete or conflict with HTU’s activities.

7. Prior to each examination series all staff and other individuals, non-Executive Members of the Board and Members of the Qualifications Committee must inform HTU of any candidates being entered for its examinations and other assessments, who are family members, other relatives or friends.

8. It is an individual’s responsibility to complete any required conflict of interest training.

**5.5 Responsible officers division: monitoring and escalation**

2. The Business Improvement and Regulation Department will begin an investigation of any

issues identified by the Responsible Officer within 24 hours. A preliminary report will be

made available to the Responsible Officer and the senior manager concerned within 5 working days.

**End of Policy.**