

Version Control

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Approval

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Conflict of Interest Policy

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Conflict of Interest Policy		3.0
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Policy Owner	Neville Algar	

Approval

Name	Neville Algar
Signature	<i>N.Algar</i>
Position	Head of Education

Policy Statement

Ignite Training encourages members of its staff to engage in a wide variety of external activities and considers that such activities are in the public interest and are also of benefit to the company and the individuals concerned.

On occasion, however, they may give rise to conflicts of interest, whether potential or actual, perceived or alleged.

All staff and learners are required to recognise and disclose activities that might give rise to conflicts of interest or the perception of conflicts and to ensure that such conflicts are seen to be properly managed or avoided.

If properly managed, activities can usually proceed as normal whilst at the same time upholding the person's obligations to the company meeting regulatory and other external requirements and protecting the integrity and reputation of the company and its members. By contrast, conflicts which are not managed effectively may jeopardise the

companies public standing and may cause serious damage to the reputation of the company and of the individuals concerned.

It is therefore Ignite Trainings policy to encourage and foster external activities whilst ensuring that when conflicts or perceived conflicts of interest arise they are acknowledged and disclosed, and in relevant cases, properly managed.

Scope

This Policy applies to all staff, earners and stakeholder of Ignite training. It is the responsibility of each individual to recognise situations in which he or she has a conflict of interest, or might reasonably be seen by others to have a conflict, to disclose that conflict to the appropriate person and to take such further steps as may be appropriate.

If an individual is uncertain about how this Policy might affect his or her activities or has any questions about its application, he or she should contact their immediate Manager or SMT.

Recognising a conflict of interest

A conflict of interest arises where the commitments and obligations owed by an individual are likely to be compromised, or may *appear* to be compromised, by that person's personal gain, or gain to immediate family (or a person with whom the person has a close personal relationship), whether financial or otherwise; or the commitments and obligations that person owes to another person or body.

There can be situations in which the appearance of conflict of interest is present even when no conflict actually exists. Thus it is important for all staff and learners when evaluating a potential conflict of interest to consider how it might be perceived by others.

The duty to declare a possible conflict applies to the perception of the situation rather than the actual existence of a conflict. However, the duty is not infringed if the situation cannot reasonably be regarded as likely to give rise to a conflict of interest.

Conflicts of interest may be financial or non-financial or both. Further information about both types is set out below.

Financial conflicts of interest

A financial conflict of interest, for the purposes of this Policy, is one where there is or appears to be opportunity for personal financial gain, financial gain to close relatives or close friends, or where it might be reasonable for another party to take the view that financial benefits might affect that person's actions.

Financial interest means anything of monetary value, for example:

- payments for services;
- equity interests (e.g. stocks, stock options or other ownership interests); and/or

- intellectual property rights (e.g. patents, copyrights and royalties from such rights).

The level of financial interest is not the determining factor as to whether a conflict should be disclosed. What might be 'not material' or 'not significant' for one person might be very significant for another. Good practice in many situations will mean the disclosure of 'any' financial interest, however small. A conflict will arise if the interest might provide, or be reasonably seen by others, to provide an *incentive* to the individual which affects their actions and where he or she has the *opportunity* to affect a Company decision or other activity (because for example he or she is the decision-maker or the principal investigator on a research project). For examples of conflicts involving financial interest.

Non-financial conflicts of interest

Non-financial interests can also come into conflict, or be perceived to come into conflict, with a person's obligations or commitments to the company, for example other body of which he or she is a trustee. Such non-financial interest may include any benefit or advantage, including, but not limited to, direct or indirect enhancement of an individual's career, education or gain to immediate family (or a person with whom the person has a close personal relationship)

Examples of Conflicts of Interest

An individual/organisation providing educational related services for the company may be in a situation of conflict of interest or potential conflict of interest if the individual/organisation:

- is working or has had worked for a centre / training provider;
- has a family member working for a centre / training provider;
- has a financial stake or shares in a centre / training provider;
- is a governor/executive at a centre / training provider;
- has a financial stake, shares or role (including full-time, part-time or voluntary) in an external company that may have dealings with the company;
- has any paid or unpaid employment, or directorship (or equivalent) with any organisation that is connected to, or could be connected to the company;
- has any membership of an organisation or body, corporate or voluntary, that is connected to, or could be connected to the company;
- has a link or interest in any of the third parties providing services to the company or approached by or on behalf of the company for accomplishing its mission

Procedure

Where the Conflict of Interest relates to a staff member's role, the staff member must disclose the Conflict of Interest to their line manager.

- If a staff member is in doubt as to whether a conflict exists, he or she should seek advice from their Line Manager or the SMT.
- If the Line Manger or SMT believes a conflict of interest exists then he/she must direct the staff member to complete a Disclosure of Conflict of Interest Form.
- If the Line Manager is in doubt as to whether a conflict of interest exists, he or she should seek advice from the SMT or a Director. The SMT or Director will then determine whether the staff member is required to submit a Disclosure of Conflict of Interest Form.

Management of conflicts of interest

Once a conflict of interest is identified and the individual concerned has completed and submitted the Disclosure of Conflict of Interest Form the Line Manager or SMT and staff member must devise an appropriate plan to resolve or manage the conflict of interest.

A management plan states matters that include:

- the nature of the staff member's personal interest
- the interest/s of the company with which the staff member's personal interest do or could conflict
- the likelihood of the interests actually coming into conflict
- the decisions or actions which the staff member agrees to avoid doing and participating in
- the decisions or actions which it is agreed the staff member can take or do.

In developing this plan any party to the conflict of interest may consult with the relevant outside agencies for guidance and assistance.

Once a management plan is devised it must be:

- signed by all parties and placed on the staff member's personal file
- reviewed annually at the time of the performance review or on an as needs basis.

All documents should be marked "confidential" and access strictly limited to those employees who need access for official purposes.

If the information relates to a conflict of interest in deliver and assessment then this information will be disclosed o relevant awarding bodies as required.

Responsibilities

Staff will:

- identify actual or possible conflict of interest affecting them and third parties in the supply chain;
- declare all situations of conflict of interest or possible conflict of interest.

Management will:

- ensure that threats to impartiality are identified and appropriate safeguards to eliminate them are put in place and maintained;
- ensure that, prior to commissioning work, all relevant third parties providing services to the company declare their actual or possible conflict of interest and sign a Non-Disclosure Agreement if they get access to confidential information.
- review any potential conflicts of interest;
- monitor declared conflicts of interest;
- provide decisions when conflicts have been declared.

Failure to comply with conflict of interest procedure

Failure to comply with this procedure or the directions of a Line Manager or a Director may result in disciplinary action. In cases of serious conflict of interest or other serious misconduct this may include dismissal.

Review

This Policy shall be the subject of regular review by the Directors and, as necessary, other relevant bodies, such review to take place in the light of guidance on best practice issued by outside bodies and, in any event, not less than once every three years.

Associated Policies

- Disciplinary policy
- GDPR Policy