

Conflict of Interest Policy

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Scope

This document outlines both our broad approach to identifying and monitoring all potential/new/actual conflicts of interest that may affect us both now and in the foreseeable future. This policy aims to negate any conflicts of interest associated with the activities undertaken by MERCURI INTERNATIONAL (UK) LTD or the activities undertaken on MERCURI INTERNATIONAL (UK) LTD's behalf.

It applies to MERCURI INTERNATIONAL (UK) LTD employees and service level staff, which include, but are not limited to:

- Managers
- Assessors
- Internal Verifiers
- Tutors
- Support Staff
- Recruitment
- Administration

Definition of a conflict of interest

A conflict of interest is a situation in which a person or organisation is involved in multiple interests, financial interest, or otherwise, one of which could possibly influence the motivation of the individual or organisation.

For the purposes of this policy we have adopted the definition used by the Regulatory Body in relation to conflicts of interest. A conflict of interest exists in relation to MERCURI INTERNATIONAL (UK) LTD where:

- Our interests in any activity undertaken by us or on our behalf has the potential to lead us to act contrary to our interests in the sale, development and delivery of apprenticeship and training programmes;
- A person, including agents, who is connected to the sale, development and delivery of apprenticeship and training programmes at MERCURI INTERNATIONAL (UK) LTD has interests in any other activity which have the potential to lead that person to act contrary to his or her interests and impact on our compliance with the requirements of (but not limited to) the Education and Skills Funding Agency and Ofsted;
- An informed and reasonable observer would conclude that either of these situations was the case.

Conflict of interest principles

In implementing our approach to identifying and managing potential/new/actual conflicts of interest, Employees are required to abide by the following principles:

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- must be proactive in the identification and management of conflicts of interest that may affect our effectiveness, level of regulatory compliance and/or reputation,
- must be open about the nature of any potential/new/actual conflicts of interest because managing conflicts of interest is about preventing issues from occurring or recurring that may impact on our operational effectiveness and/or regulatory compliance, and
- must strive to identify and deal with conflicts of interest at the earliest opportunity.
- Identifying a conflict of interest

Examples of conflict of interest that could compromise the integrity of our service offer are:

- Business or commercial interests that may affect a person's professional judgment
- Personal relationships with family or friends that could affect or influence a decision
- Gifts or hospitality that could influence a decision
- Mutually beneficial arrangements that could compromise an individual's ability to make a professional judgment
- Where favourable arrangements have been negotiated, e.g. supplying information in preparation of a sale

Responsibility to register a conflict of interest

Responsibility to register a conflict of interest applies to all individuals involved in the sale, development and/or delivery of apprenticeships and training programmes where there is either a real or potential conflict of interest, this should be made known immediately to the Apprenticeship Manager via email containing as much detail as possible, but as a minimum:

- Nature of the conflict of interest
- Individuals involved, including names, job roles and locations
- Date and time of the alleged offence (approximate if not known)
- Outline description of the type of conflict of interest and why you feel this to be the case

If you are unsure of whether a conflict of interest exists please contact the Apprenticeship Manager in the first instance.

Colleagues responsibilities

- Avoid conflicts of interest wherever possible
- Reduce the impact of where a conflict of interest may exist
- Complete a conflict of interest disclosure form and forward to your line manager, retaining a copy for your records
- Update your line manager if there is a change in circumstances

Management responsibilities

- Take steps to avoid conflict of interest wherever possible
- Maintain a record of real and potential conflicts of interest

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- Inspect activities and assessments where a conflict of interest cannot be avoided

Dealing with conflicts of interest and/or breaches to the procedures outlined in this policy

Should there be a breach of this policy and/or unforeseen conflicts of interest emerge, employees must inform MERCURI INTERNATIONAL (UK) LTD at the earliest opportunity and we will carry out an investigation immediately, along with a review of the associated procedures.

Review arrangements

We will review this document annually as part of our self-evaluation arrangements. However, a review will be commissioned earlier should an issue arise in relation to an actual or potential conflict of interest and/or in response to customer, learner or regulatory feedback.

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