**Conflict of Interest Policy**

TrainerMaker encourages members of its staff to engage in a wide variety of activities. Mainly, the traditional academic roles, such as teaching and supervising students. TrainerMaker recognises that involvement in these activities can, on occasion, give rise to conflicts of interest, whether potential or actual, perceived or alleged. Therefore, all TrainerMaker staff 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 TrainerMaker’s open, transparent and honest working practices, meeting regulatory and other external requirements and protecting the integrity and reputation of the TrainerMaker. By contrast, conflicts which are not managed effectively may jeopardise TrainerMaker’s public standing and may cause serious damage to it’s reputation and the reputation of the individuals concerned.

It is therefore the TrainerMaker’s policy to encourage and foster openness and honesty whilst ensuring that when conflicts or perceived conflicts of interest arise they are identified and disclosed, and in relevant cases, appropriately managed. In every instance, the TrainerMaker reserves the right to make a determination in light of its best interest.

Recognising conflict of interest

A conflict of interest arises where the commitments and obligations owed by an individual member of staff to TrainerMaker or to other bodies, for example a funding body, 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 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.

Procedure

It is the duty of every member of staff to accurately and promptly disclose:

* a change in status of an existing actual, perceived, or potential conflict of interest and/or commitment.
* a new actual, perceived, or potential conflict of interest and/or commitment.

Apparent or perceived conflicts of interest can be as damaging as actual conflicts of interest. Staff should consult their line manager if they are uncertain about whether a situation or activity presents a conflict of interest. The line manager shall evaluate the activity or situation and advise on the most appropriate course of action.

The general rule, is that disclosure should be made at the time the conflict first arises, or it is recognised that a conflict might be perceived, in writing to the line manager. If the line manager has an interest in the matter to be discussed, the disclosure shall be made to the person at the next higher level of authority. In most cases this will be to the Managing Director of TrainerMaker.

Disclosure in all cases shall include the type of potential conflict (conflict of interest or commitment), the nature of the activity, a description of all parties involved, the potential financial interests and rewards, possible violations of legal requirements, and any other information that the employee feels necessary to evaluate the disclosure

Many situations will require nothing more than a declaration and a brief written record of that declaration, which must be held in TrainerMaker’s records.

Some instances will however need to be dealt with by agreeing how the conflict can be actively managed to eliminate the conflict, safeguard against prejudice toward TrainerMaker activities and provide continuing oversight. The approach adopted should be documented in a management plan and copies provided to the relevant parties. A copy of the final plan must be held in TrainerMaker’s records. One or more of the following strategies may be appropriate to manage the conflict of interest:

* not taking part in discussions of certain matters;
* not taking part in decisions in relation to certain matters;
* referring to others certain matters for decision;
* resolving not to act as a particular person's supervisor;
* divesting or placing in trust certain financial interests;
* publishing a notice of interest;
* standing aside from any involvement in a particular project; and/or
* declaring an interest to a particular sponsor or third party.

It is the responsibility of those affected to comply with the approach that has been agreed.

External members and consultants to the TrainerMaker are also required to divulge any personal or family financial holdings or situations that could create a conflict of interest and/or introduce bias into their professional judgement. Such disclosures should be made to TrainerMaker’s Managing Director, and appropriate determination shall be made on the management of any conflict.

Failure to follow the procedure set out in this policy or failure to comply with any stipulated management plan for managing the disclosed conflict will be considered a serious matter and may lead to disciplinary action being taken against the individual.

**REMEMBER: THE OVERRIDING PRINCIPLE IS THAT IF IN DOUBT, DISCLOSE.**