**Conflict of Interest Policy**

1. **Purpose and Scope**

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. Conflicts of interest can arise in a variety of circumstances, for example:

* when an individual has a position of authority in one organisation which conflicts with his or her interests in another organisation
* when an individual has personal interests that conflict with his/her professional position, for example where someone has friends or relatives taking assessments or examinations that they are marking or assessing
* when an organisation has a conflict of interest, for example in delivering two programmes that conflict in outcomes.

In the regular course of business, Board members and St Helens Chamber employees may have the opportunity to advance their own personal interests with or against the interests of the Chamber or one area of operational delivery.

Acting in such a manner is unacceptable and any party who acts outside of the company’s best interest may be subject to disciplinary action.

Our Whistleblowing Policy is in place to enable colleagues to feel secure in highlighting any suspected conflicts of interest or other concerns.

1. **Roles and Responsibilities**

All staff have a responsibility to be aware of the potential for a conflict of interest. Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact; for example, in reducing the standards of regulated units and qualifications.

The Chamber is required to take all reasonable steps to limit any conflict of interest between its directors and employees and any person with whom the Chamber has dealings.

Directors and employees of the Chamber are under a duty to declare to the Board of Directors any direct or material interest that may at any time arise either directly or through related parties. The Chamber maintains a Register of Declared Interests of directors and employees detailing the nature and extent of such interest. A check will be made each year to ensure the contents are up to date.

1. **Conflict of Interest procedures**
	1. f there is a declared potential conflict of interest the relevant individual shall not be involved in any decision in respect of such matter. No contract will be made with or funding given to any person, organisation or company in respect of which a material interest has been declared, without prior approval of the Chief Executive and if necessary Board agreement. A register of such conflicts will be maintained.
	2. Within our Training Departments, prior to enrollment, assessment or examination, all staff are required to inform the Team Leader of any candidates who are family members, other relatives, or friends. Where there is a potential or actual conflict of interest the individual and line manager are responsible for ensuring that the issue is documented carefully. The line manager must either resolve the issue or refer it to the relevant Senior Manager. All records are required to be available for audit purposes.
	3. When a possible personal or organizational conflict of interest arises, the relevant Senior Management Team member will collect the pertinent information and may question any concerned parties. Where necessary, a meeting of the SMT may take place to determine if a conflict exists, and steps that will be taken to address the conflict. If no conflict exists, the inquiry may be documented but no further action will be taken. Where SMT/Chief Executive may be involved, our Board, specifically any member of the Audit, Risk and Resources Sub Group, may step in to review potential conflicts of interest.
	4. If a conflict of interest is found to have taken place, any transactions that may have been affected will be reviewed retrospectively. Affected parties both within and outside of the business, including shareholders, directors, employees, and contractors will be notified. An investigation will also be conducted by the Board to determine the extent of the conflict and the intentions of the parties involved. If the conflict in question involves a member or members of the board of directors, such a member will be excused from the deliberations.
	5. As all conflicts of interest will be reviewed on a case-by-case basis, a review may result in action in accordance with our disciplinary procedures.
2. **Conflict of Interest procedures**

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