


UHL Apprenticeship and Development Centre Conflict of Interest Policy

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1. Rationale

University Hospitals of Leicester Apprenticeship and Development Centre is committed to providing a fair, consistent and accessible service to all our customers. The purpose of this policy is to provide guidance on handling possible conflicts of interest that may arise as a result of the Centre's role as a training provider.

2. Definition

2.1 A conflict of interest is a situation where there are competing interests or loyalties and where a person is in a position to be able to derive personal benefit from actions or decisions made in their official capacity. This may compromise or appear to compromise their decisions.

2.2 Condition A4 in the Ofqual General Conditions of Recognition (2025) states that a conflict of interest exists in relation to an Awarding Organisation where:

- The organisation's interests in any activity undertaken by it, on its behalf, or by a member of its group have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications in accordance with its Conditions of Recognition
- A person who is connected to the development, delivery or award of qualifications by the awarding organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award in accordance with the awarding organisation's Conditions of Recognition
- An informed and reasonable observer would conclude that either of the above situations was the case.

2.3 Examples of Conflicts of Interests

Conflicts of interest can arise in a variety of different circumstances. It is not possible to provide a definitive list of examples of conflicts of interests, but the following are examples of situations that could lead to actual or perceived conflicts of interest:

- Practitioners (trainers), Facilitators (assessors) and Internal Quality Assurers (IQAs) have a close or familial relationship with an academy registered learner or their family whilst being involved in decisions relating to the outcome of their standard
- An individual has a position of authority in one organisation which conflicts with his or her interests in another organisation
- Practitioners, Facilitators and/or IQAs etc. using non-public information or learner data for personal gain or advantage
- An individual has personal interests that conflict with his/her professional position
- An individual who is connected to the development, delivery or award of qualifications at the Centre has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in the development, delivery or award in accordance with the awarding organisation's conditions of recognition

- An informed and reasonable observer would conclude that any of the above situations was believed to be the case.

3. Process

It is the duty of Centre staff employed by University Hospitals of Leicester Apprenticeship and Development Centre to disclose any actual or potential conflict of interest and the process for doing so is documented in appendix 1.

- All centre staff by the Centre are issued with a Conflict of Interest Form to complete on commencement with the Centre (appendix 2)
- The form is to be completed even when the individual has no conflict of interest to declare
- The form needs to be updated annually as a minimum by the employee and submitted to their line manager and Centre Education Manager. It is the responsibility of the employee to complete and submit this form and also to make interim arrangements if their circumstances change
- The information held on the Conflict of Interest form is maintained by the Centre Education Manager and is kept confidential in a folder in a locked office or efile that is password protected online
- The manager will keep a copy in the staff member's Centre personal file (manual or efile)
- The information submitted is evaluated by the Centre Education Manager to identify if any further action is required and a written record of the outcome of the evaluation is kept alongside the Conflict of Interest form in a folder in a locked office or cabinet (appendix 3) or on a secured in a password protected efile
- The manager should ensure that any conflict of interest is also registered through the UHL policy as part of their broader role and responsibility.

4. Action

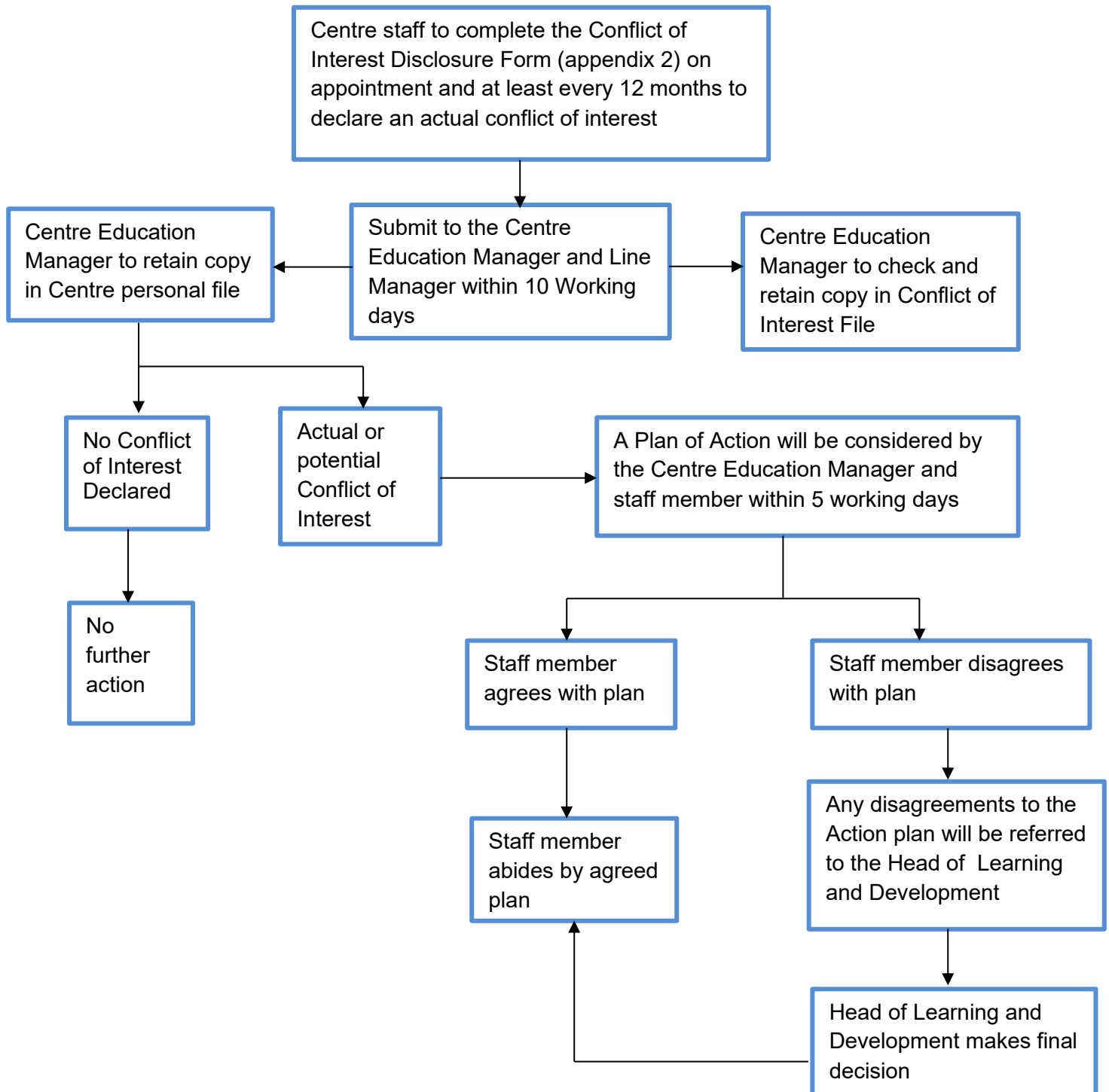
- 4.1 Most situations require no further action than the completion of the Conflict of Interest Form. In some instances, however, the information declared on the form will require some follow-up action in order for the conflict of interest to be managed appropriately (appendix 4).
- 4.2 The approach agreed between the employee and the Centre Education Manager will be documented and held with the conflict of interest forms. Should any disputes occur during these discussions the final decision will be made by the Head of Learning and Development.

Examples of actions that could be taken:

- Individual not taking part in discussions or decisions of certain matters, referring certain matters for decision to others with no vested interest, agreeing not to be involved with identified learners or declaring an interest when it is appropriate to do so.

Appendix 1

Flowchart showing actions to be taken should a potential or actual conflict of interest arise



Appendix 2

**University Hospitals of Leicester Development and Apprenticeship Centre
CONFLICT OF INTEREST DISCLOSURE FORM
For staff**

1.0 It is the policy of University Hospitals of Leicester Apprenticeship and Development Centre to address how issues of actual, potential and perceived conflicts of interest involving employees of the Centre should be identified, disclosed and managed. This form is designed to identify and disclose known conflicts in an effort to properly manage them. It is the employee's responsibility to proactively declare potential and actual conflicts of interest and ensure the document is annually reviewed.

2.0 I have read University Hospitals of Leicester's Apprenticeship and Development Centre's Conflict of Interest policy and understand that as an employee of the Centre it is my obligation to act in a manner which promotes the best interests of the Centre and to avoid conflicts of interest when making decisions and taking actions on behalf of the Centre.

My answers to this disclosure form are correctly stated to the best of my knowledge and belief. Should a possible conflict of interest arise in my responsibilities to University Hospitals of Leicester's Apprenticeship and Development Centre I recognise that I have the obligation to notify the Centre Education Manager within 2 working days. It is the Centre Education Manager's responsibility to determine whether a conflict exists and how that conflict shall be resolved. I understand that should I wish to appeal against this outcome; the Head of Learning and Development will make the final decision.

If any relevant changes occur during my period of employment, I recognise that I have a continuing obligation to disclose any Conflict of interest to the Centre Education Manager. I will take responsibility for annually reviewing this declaration.

I understand that the information on this form is solely for use by University Hospitals of Leicester's Apprenticeship and Development Centre and is considered confidential information. Release of this information within the Centre will be on a need-to-know basis only. Release to external parties will be only when required by law. I understand it will be stored in my Centre personnel file.

Signature

Name *(print)*

Position **Date**

3.0 Reviewed by name (print)		Date	
Action needed Y/N	Summary of action taken	Date action complete	

4.0 Please complete the following questions, and submit this form to the Centre Education Manager of University Hospitals of Leicester Apprenticeship and Development Centre.

4.1 Do you have a close or familial relationship with a registered learner of the UHL Apprenticeship and Development Centre or their family, whilst being involved in decisions relating to the outcome of their work?

Yes/No

If yes, please state the name of the learner and the relationship identified

.....
.....

4.2 Do you have a close or familial relationship with another staff member or their family whilst being involved in decisions relating to the outcome of their work?

Yes/No

If yes, please state the name of the staff member and the relationship identified

.....
.....

4.3 Do you have any conflict of interest with any of the Awarding Bodies used by the academy?

Yes/No

If yes, please state the name of the staff member and the relationship identified

.....
.....

4.4 Have you or an immediate family member accepted gifts, gratuities, lodging, dining, or entertainment that might reasonably appear to influence your judgment or actions concerning the business of UHL Apprenticeship and Development Centre?

Yes/No

If yes, please state the name of the staff member and the relationship identified

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4.5 If any material changes to the responses provided on this disclosure form occur, the employee is required to update the information on this form in writing, and submit the update to the Centre Education Manager. An update should be scheduled annually by the employee

Appendix 4

Action Plan

Employees Name:

Job Role:

Summary of Conflict

Conflict /Potential Conflict	Required Actions	Potential time frame	Employees Signature