



# Carnew Training & Development Centre (Carnew TDC)

## Managing Conflict of Interest Policy

Version 1 reviewed March 2016

Version 2 reviewed April 2018

Version 3 reviewed February 2020



## Definition of Conflict of Interest

A conflict of interest occurs when an individual or organisation is involved in multiple interests, one of which could possibly corrupt the motivation for an act in the other.

For Carnew Training & Development Centre this includes any person or organisation that is connected to the development of products or delivery of services and has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that the development of those products or delivery of those services.

Carnew Training & Development Centre is committed to identifying, managing, recording and, where relevant, disclosing actual or potential conflicts of interests. This policy has been developed to support Carnew TDC in this process and will be disseminated as required.

It should be noted, however, that given the areas of activity within which Carnew TDC operates, there are likely to be co-incidences of interest which should only be discouraged were they to run counter to the Conflict of Interest policy.

## Who this policy applies to

- Employees
- Contracted personnel
- Organisations approved by Carnew TDC to undertake specific functions
- Any persons that carry out any service for Carnew TDC whether paid or unpaid

## Where conflict of interest may occur

There is potential for conflict of interest to occur in a number of ways, for example:

- Tendering process (Carnew Training & Development Centres contracts)
- Information and intelligence made available to or ascertained by another party (within or without Carnew Training & Development Centre) prior to its release into the public domain and which thereby enables that other party to gain unfair financial or other advantage
- Any other activity that might cause Carnew Training & Development Centre to be compromised in the discharge of one or more of its activities.



## Information and Intelligence

- Information or intelligence gained through Carnew Training & Development Centre legitimate work and activities regarding labour markets, skills, learning supply or other areas within its legitimate sphere of interest is made available on an equal basis to all interested parties
- Ensuring that no organisation benefits from information or intelligence gained by Carnew TDC to the disadvantage of others.

## Employees

- Employees should not misuse official positions or information acquired in official duties to further their private interests or those of others if they are responsible for money or financial matters, directly or indirectly, or in handling contracts, they should identify possible conflicts of interest early on and raise with their Manager
- In certain circumstances, it may not be appropriate to retain gifts or be provided with entertainment and employees may be asked to return the gifts to the sender or refuse the entertainment where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers, chocolates or a bottle of wine, may be retained by employees

## Assessment and Moderation

- Ensuring that all reasonable steps are taken to avoid any part of the assessment of a Learner (including by way of Moderation) being undertaken by any person who has a personal interest in the result of the assessment
- Where having taken all such reasonable steps, an assessment by such a person cannot be avoided, Carnew Training & Development Centre will make arrangements for this to be subject to scrutiny;
- Carnew Training & Development Centre ensures that all reasonable steps are taken to ensure that no conflict of interest which relates has an adverse effect. Where such conflict of interest has had an adverse effect, Carnew TDC will take all reasonable steps to mitigate the effect.

