



HCT Learning

Quality Assurance Manual

2020

Conflict of Interest Policy

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1 Conflict of Interest

Conflicts of interest arise when there is an influence or appear to be influence by personal and professional interests. 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.

HCT Learning employees, as well as a “sub-contractors” acting on behalf of HCT have an obligation to:

- Act in the best interests of the company.
- Declare any personal or business interests which may conflict with their responsibilities.
- To ensure a conflict of interest will be recorded and reported outlining the, nature and extent of the conflict and actions taken to manage the conflict.
- Not misuse official positions or information acquired in official duties to further private interests or those of others if they are responsible for money or financial matters, directly or indirectly, or in handling contract.
- Perform duties fairly and impartially and that decisions are not affected by self-interest and/or personal gain.
- Take personal responsibility for actions.
- Never hide or ignore a conflict of interest or gain personally from an opportunity encountered.
- Report all conflicts of interests that cannot be avoided and for persons to participate in their resolution or management.

Having a conflict of interest is sometimes unavoidable and persons or companies will not be adversely treated just for having a conflict of interest, unless conduct in dealing with it is corrupt, criminal or otherwise demonstrates lack of integrity.

1.2 Identifying Conflict of Interests

Conflicts of interest can arise in a variety of circumstances. Examples of a conflict of interest are listed below:

- Has a position of authority in one organisation that conflicts with his or her interests in another organisation.
- Carries out work on HCT Learnings behalf, but may have personal interests (paid or unpaid) in another business which either uses HCT Learnings products or services, or produces similar products.
- Makes a media comment that is perceived as a conflict of interest.
- Makes a public comment that is perceived as a conflict of interest.
- Makes an endorsement that is perceived as a conflict of interest.
- Release information to third parties and is perceived as a conflict of interest.
- Provides a character reference that results in a conflict of interest.
- Influences part of the selection and recruitment process that is perceived as a conflict of interest.
- Has an interest in a family or private business.
- Has directorships of other companies.
- Has close relatives which may conflict with their status as a director, examiner, assessor, instructor, quality assurer, verifier, member of staff.
- Enters into a financial or operational agreement with an organisation or individual in which there is a vested interest.
- Accepts gifts from others to promote their interests within the organisation.

HCT Learning is committed to identifying, managing, recording and, where relevant, disclosing actual, perceived or potential conflicts of interests. The aim of this policy is to protect both the organisation and the individuals involved from any real or perceived or potential impropriety. Conflicts of Interest will be recorded on our risk register. HCT Learning will mitigate risks that have the potential to cause an adverse effect to learners. All incidents will be logged and maintained on our risk register to ensure the issue is highlighted managed and mitigated against.

1.3 Actions

Action should only be considered where an individual or sub-contractor:

- Fails to identify a conflict (where they are reasonably expected to identify)
- Fails to avoid a conflict that could have been avoided

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- Fails to report an unavoidable conflict
- Takes action on a conflict to benefit their personal or private interests
- Fails to cooperate in the management of a conflict
- Fails to comply with the policy

Failure to disclose a conflict of interest may result in disciplinary action or termination.