

POLICY NAME	CONFLICT OF INTEREST POLICY		
POLICY REF	PSPP06	REVISION	7
AUTHOR	S HAMER	DATE	31/01/2024
APPROVED BY	J HAMER	NEXT REVIEW	31/01/2025

Introduction

As a regulated awarding organisation Pentagon Skills is required by the General Conditions of Recognition to have in place a conflict of interest policy that enables us to identify, manage and mitigate conflict of interest. All relevant staff and other individuals have a responsibility to be aware of the potential for a conflict of interest.

Purpose

The purpose of this policy is to protect our integrity as a business and the integrity of our qualifications. The policy is also designed to protect our staff by providing guidance on handling possible conflicts of interest that may arise because of Pentagon Skills role as an awarding organisation.

This policy:

- Defines what is meant by conflict of interest.
- Describes the role of conflict of interest in the context of working with, or for, an awarding organisation.
- Sets out the responsibilities for managing conflict of interest at each level in the organisation.

Policy Scope

This policy applies to all staff and other individuals who interact or potentially interact with the work of the awarding organisation. This includes individuals involved with any aspects of the creation, marketing, sales, distribution, marking or any other activity connected with Pentagon Skills qualifications, tests and assessments, and supporting resources and services. The individuals falling within the scope of this policy include directors, employees, contractors, home workers, agency workers and any associate staff, including assessment associates, verifiers/examiners and freelance staff.

Definition of Conflict of Interest

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

Conflict of Interest Policy

Conflicts of interest can arise in a variety of circumstances relating to awarding organisation activity, for example: -

- Where the training delivery function and the awarding function rest within one umbrella organisation.
- When an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation.

- When an individual has interests that conflict with his or her professional position.
- Where someone works for or carries out work on Pentagon Skills behalf, but may have personal interests – paid or unpaid – in another business which either uses Pentagon Skills products or services, or produces similar products.
- Where someone works for or carries out work on Pentagon Skills behalf, who has friends or relatives taking Pentagon Skills assessments or examinations.
- When one part of Pentagon Skills creates and follows a procedure that conflicts with Pentagon Skills regulatory responsibilities as an awarding organisation.

Responsibilities

The Board

The ultimate responsibility for the conflict of interest policy, dissemination of the policy and management of potential and actual conflicts of interest rests within Pentagon Skills senior management board.

Senior Management

Managers in each Division are responsible for communicating the Conflict of Interest Policy to all relevant individuals within their areas of responsibility annually.

Division/Departmental Responsibility of Directors & Their Senior Managers

- All departments are required to review their procedures annually to ensure that they anticipate and manage potential or actual conflicts of interest.
- Divisional and departmental management meetings are required to give appropriate attention to potential or actual conflicts of interest.
- Line managers are responsible for ensuring that all new staff receives conflict of interest training.
- Any potential or actual conflict of interest must be documented within the Division or Department. The line manager must either resolve the issue or, for issues that cannot be resolved at this level, report the issue to their Director and/or the Responsible Officer (scott@pentagonskills.co.uk). All records are required to be available for audit purposes.

Individual Responsibility

- Individuals within Pentagon Skills have responsibility for ensuring that they are familiar with the Conflict of Interest Policy and any guidelines.
- All individuals will be required annually to read and understand the Conflict of Interest Policy.
- The most important feature of the policy is the requirement that an individual disclose any activity that might give rise to a potential conflict of Conflict of Interest policy interest. If there is any doubt whether, it represents a conflict of interest report it.
- The individual and line manager are equally responsible for ensuring that the issue is documented carefully.
- An individual may wish to raise concerns relating to conflict of interest directly with the Responsible Officer. This may be done in confidence and they are entitled to

receive a response to their concerns. It should be noted that individuals are protected under the company's Whistle Blowing Policy.

- Any staff member considering paid or unpaid work outside Pentagon Skills should inform their manager if they think there is any potential for a conflict of interest. If the staff member is unsure whether a conflict of interest might arise, they should discuss this with their line manager first. The line manager should contact the conflict of interest inbox if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A staff member must not take on any such activities that could be deemed to compete or conflict with Pentagon Skills activities.
- Prior to each examination series all staff and other individuals, non-Executive Members of the Board and Members of the Qualifications Committee must inform the awarding body of any candidates being entered for its examinations and other assessments, who are family members, other relatives or friends. They are asked to declare this information.
- It is an individual's responsibility to complete any required conflict of interest training.

Responsible Officers Division: Monitoring & Escalation

- The Responsible Officer is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the business and, when necessary, to the Board and the regulatory authorities.
- The Business Improvement and Regulation Department will begin an investigation of any issues identified by the Responsible Officer within 24 hours. A preliminary report will be made available to the Responsible Officer and the senior manager concerned within 5 working days.

Advice & Guidance

Any required guidance or interpretation on potential conflicts of interest should be sought from the office of the Responsible Officer (scott@pentagonskills.co.uk).

Regulatory References

- Ofqual Accreditation require all awarding organisations to establish and maintain their compliance with regulatory conditions and criteria. As part of this process, policies that relate to Pentagon Skills status as an awarding organisation will reference the conditions and criteria that they address. This policy addresses the following regulatory criteria and conditions: -Ofqual General Conditions of Recognition

The awarding body must ensure that they employ robust processes to protect their own business interests as well as the interests of their approved centres and learners.