1. JC TRAINING & CONSULTANCY Staff, consultants and directors

	1. All JC TRAINING & CONSULTANCY staff, consultants (including quality assurance officers, markers, and others providing services to JC TRAINING & CONSULTANCY associated to regulated functions) and directors must notify the named point of accountability of any businesses, relationships, contracts, or other activities that are, or may be considered to be a conflict of interest with JC TRAINING & CONSULTANCY ’s regulated functions; notification must be in writing (email is acceptable) and must be made as soon as the potential conflict is identified.

	Conflict of interest includes, but is not restricted to:
* Non- JC TRAINING & CONSULTANCY business interest or activity that could call into question the integrity of JC TRAINING & CONSULTANCY ’s regulated activities
* Interest in a learning provider (shareholder, associate, employee, consultant, internal or external quality assurance officer) that is approved or recognised by JC TRAINING & CONSULTANCY to deliver regulated qualifications
* Personal knowledge (including relative or friend) of a learner registered with JC TRAINING & CONSULTANCY for a regulated qualification

	1. All JC TRAINING & CONSULTANCY staff are required to complete a conflict of interest statement annually during their staff review, confirming that they do not have a conflict of interest with regard to JC TRAINING & CONSULTANCY ’s regulated functions, and will be required to declare immediately upon notification of a potential conflict.

* 1. The named point of accountability will investigate any notifications of potential conflicts of interest.
	2. The named point of accountability will present the findings of the investigation to the JC TRAINING & CONSULTANCY management, outline any adverse, or potential adverse effects, and seek approval of any proposed course of action.
	3. Where a member of the JC TRAINING & CONSULTANCY management is the subject of a potential conflict of interest case, they will be excluded from the approval process.
	4. Where the named point of accountability identifies they may have a potential conflict of interest, they will report this to another JC TRAINING & CONSULTANCY member, who will undertake the steps outlined in a to d above.
	5. Investigation outcomes include but are not restricted to:
* No conflict of interest
* Possible conflict of interest – further information required
* Where conflict of interest –
	+ member or staff/consultant ceases the activity creating a conflict
	+ member or staff/consultant ceases working for JC TRAINING & CONSULTANCY
	+ where appropriate, member or staff/consultant ceases working on all regulated functions
	+ where appropriate, member or staff/consultant ceases working on regulated functions with specific customers
	+ where the person accountable for regulated functions or other director have a serious conflict of interest, they will be removed as a director of the company. Were this situation to arise, JC TRAINING & CONSULTANCY would inform the regulators.
	1. All investigations will be recorded. Notes and details will be retained throughout the subject’s employment with JC TRAINING & CONSULTANCY, and for a further period of 5 years after the subject’s employment with JC TRAINING & CONSULTANCY has ceased. All investigation notes will be available to regulators.

1. JC TRAINING & CONSULTANCY business activity

	1. JC TRAINING & CONSULTANCY will not undertake of any business activity that may be deemed to be a conflict of interest with its regulated functions.
	2. JC TRAINING & CONSULTANCY management will consider COI implications of JC TRAINING & CONSULTANCY activities at JC TRAINING & CONSULTANCY management meeting.
2. **Associates on behalf of JC TRAINING & CONSULTANCY Ltd**

For all assessment methods;

* 1. Centres / Individuals must abide and implement the conflict of interest policy to which all staff and related parties agree to comply with, which should include the identification and consideration of any possible adverse effects. The policy must be made available to JC TRAINING & CONSULTANCY staff for agreement.
	2. Centres / Individuals must inform JC TRAINING & CONSULTANCY of any employee or consultant involved in the assessment process or the quality assurance of the assessment process who has a personal interest (for example, shareholders) in the Centre, the learner or other potential conflict of interest. See 3 g below.

	Centres / Individuals must implement the policy to investigate all potential conflicts of interest and inform JC TRAINING & CONSULTANCY of the investigation, agree a timescale for completion and the outcome. This must be in writing.
	3. All investigations will be recorded and notes will be retained as indicated in 1(h).
	4. Where the named point of accountability is subject to the conflict of interest the investigation must be conducted by a senior member of staff within the Centre; this should be agreed with JC TRAINING & CONSULTANCY.
	5. Conflict of interest includes, but is not restricted to:
* Business interest or activity that could call into question the integrity of regulated qualifications or activities provided by the centre.
* Interest in JC TRAINING & CONSULTANCY or the learner’s employer (shareholder, associate, employee, consultant or quality assurance officer).
* Personal knowledge (including relative or friend) of a learner registered with JC TRAINING & CONSULTANCY for a regulated qualification.
* Assessment of regulated qualifications by an interested party.

	1. It is recommended that all Centre staff are required to complete a conflict of interest statement twice per year, confirming that they do not have a conflict of interest.

* 1. Investigation outcomes include but are not restricted to:
* No conflict of interest
* Possible conflict of interest – seek JC TRAINING & CONSULTANCY guidance
* Where conflict of interest –
	+ member or staff/consultant ceases the activity creating a conflict
	+ member or staff/consultant ceases working for the Centre
	+ where appropriate, member or staff/consultant ceases working on all regulated functions
	+ where appropriate, member or staff/consultant ceases working on regulated functions with specific customers
	+ where appropriate, member or staff/consultant is subject to additional scrutiny by an independent assessor or quality assurance member of staff (without a personal interest or conflict of interest) where the nature of additional scrutiny is agreed in advance with JC TRAINING & CONSULTANCY
* Where the conflict involves the assessment of regulated qualifications by an interested party, JC TRAINING & CONSULTANCY will carry out an investigation.

**See also JC TRAINING & CONSULTANCY policies for quality assurance of internally and externally assessed units and qualifications**