



Conflict of Interest Policy

Policy Statement

JC Training & Consultancy Ltd is committed to maintaining the highest standards of integrity, transparency, impartiality and professional conduct in all aspects of its business activities. We recognise that conflicts of interest have the potential to compromise decision-making, undermine stakeholder confidence and damage the reputation of the organisation.

This policy establishes the framework through which actual, potential and perceived conflicts of interest are identified, declared, managed and monitored. It applies to all directors, employees, associates, consultants, subcontractors, assessors, quality assurers, volunteers and any individual acting on behalf of JC Training & Consultancy.

The organisation is committed to ensuring that all decisions are made in the best interests of learners, employers, awarding organisations, funding bodies, regulators and stakeholders and are not influenced by personal, financial or professional interests.

Purpose

The purpose of this policy is to protect the integrity and reputation of JC Training & Consultancy by ensuring that conflicts of interest are identified promptly and managed effectively.

The policy supports compliance with the Companies Act 2006, the Equality Act 2010, Data Protection Act 2018, UK General Data Protection Regulation, apprenticeship funding requirements issued by the Department for Education and expectations established by Ofsted and awarding organisations.

The policy also supports the organisation's commitment to good governance, ethical leadership and public accountability.



Scope

This policy applies to all individuals who have the ability to influence decisions, access confidential information or act on behalf of JC Training & Consultancy.

This includes directors, managers, employees, consultants, trainers, assessors, internal quality assurers, external quality assurers, subcontractors, volunteers and any third-party representatives engaged by the organisation.

The policy applies to all organisational activities, including apprenticeship delivery, learner recruitment, assessment, quality assurance, procurement, contracting, employer engagement, funding administration and strategic decision-making.

Definition of a Conflict of Interest

A conflict of interest occurs when an individual's personal, financial, professional or family interests have the potential to influence, or appear to influence, their judgement, objectivity or decision-making.

- Conflicts may be actual, potential or perceived.
- An actual conflict exists where competing interests are currently affecting an individual's ability to act impartially.
- A potential conflict exists where circumstances could give rise to a conflict in the future.
- A perceived conflict exists where a reasonable person could conclude that an individual's judgement may be compromised, even where no actual conflict exists.
- The existence of a conflict does not necessarily imply wrongdoing. However, undeclared or unmanaged conflicts can create significant risks for both the individual and the organisation.

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Examples of Conflicts of Interest

Conflicts of interest may arise in a variety of circumstances.

Examples include, but are not limited to, situations where an employee, consultant or director has a financial interest in an organisation that supplies goods or services to JC Training & Consultancy.

A conflict may arise where an individual is involved in recruiting, assessing, supporting or quality assuring a learner who is a relative, close friend, business associate or household member.

Conflicts may occur where an employee has a secondary employment arrangement that competes with or conflicts with the interests of JC Training & Consultancy.

Directors and senior managers may experience conflicts where personal investments, shareholdings, partnerships or directorships influence organisational decision-making.

Conflicts may also arise through procurement activities, subcontracting arrangements, employer relationships, funding decisions, contractual negotiations or access to commercially sensitive information.

The acceptance of gifts, hospitality or benefits from suppliers, employers or other stakeholders may also create actual or perceived conflicts of interest.

Declaration of Interests

All employees, directors, consultants and associates are required to declare any actual, potential or perceived conflict of interest as soon as it becomes known.

Declarations must be made in writing to the Managing Director or nominated senior leader responsible for governance.



Individuals must not wait until a conflict has influenced a decision before making a declaration. The responsibility rests with the individual to disclose any circumstances that could reasonably be viewed as a conflict of interest.

Annual declarations will be completed by all staff as part of performance review and compliance processes. However, annual declarations do not remove the requirement to report conflicts immediately when circumstances change.

Register of Interests

JC Training & Consultancy will maintain a Register of Interests containing details of all declared conflicts and relevant interests.

The register will include information relating to directorships, business interests, shareholdings, secondary employment, consultancy arrangements, close family relationships and any other interests that may reasonably be considered relevant.

The register will be reviewed periodically by senior leadership to ensure that information remains accurate and current.

Managing Conflicts of Interest

Upon receipt of a declaration, an assessment will be undertaken to determine the nature and significance of the conflict.

Consideration will be given to the likelihood of the conflict affecting decision-making, organisational integrity, regulatory compliance or stakeholder confidence.

Management actions may include enhanced oversight, restrictions on involvement in specific activities, reassignment of responsibilities, withdrawal from decision-making processes or, in serious cases, termination of employment or contractual arrangements.

The organisation recognises that effective management of conflicts often requires proportionality and transparency rather than exclusion from all organisational activities.



Directors and Senior Leadership

Directors have additional responsibilities under the Companies Act 2006 to avoid situations in which they have, or may have, interests that conflict with those of the company.

Directors must declare any direct or indirect interests in proposed transactions, contracts or business arrangements involving JC Training & Consultancy.

Where a conflict exists, the director concerned will withdraw from relevant discussions and decisions unless expressly authorised in accordance with company governance arrangements.

The Board or Senior Leadership Team will determine whether additional controls are required to protect the integrity of organisational decision-making.

Apprenticeship Delivery and Assessment

JC Training & Consultancy recognises the importance of maintaining fairness, objectivity and impartiality throughout apprenticeship delivery, assessment and quality assurance processes.

Individuals must not assess, quality assure or make progression decisions regarding learners where personal relationships or other interests could compromise objectivity.

Where such situations arise, alternative arrangements will be implemented to protect the integrity of assessment decisions and maintain confidence in learner outcomes.

Gifts and Hospitality

Employees, directors and representatives must not accept gifts, hospitality or benefits that could influence, or be perceived to influence, business decisions.

Reasonable and proportionate hospitality may be accepted where it is transparent, lawful and does not create an obligation or expectation of favourable treatment.

Any significant gifts or hospitality must be declared and recorded in accordance with organisational procedures.

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Monitoring and Assurance

The organisation will monitor compliance with this policy through internal audits, governance reviews, quality assurance activities and annual declarations.

Any breaches of this policy will be investigated and may result in disciplinary action, termination of contracts or referral to external bodies where appropriate.

Record Keeping

All declarations, investigations and management actions relating to conflicts of interest will be documented and retained securely in accordance with the Data Protection Act 2018 and organisational retention schedules.

Records will normally be retained for a minimum of six years following the end of employment, engagement or contractual relationship unless a longer retention period is required by law or regulatory requirements.

Review

This policy will be reviewed annually by the Managing Director and Senior Leadership Team to ensure continued compliance with legislation, regulatory requirements and best practice.