

# Conflicts of Interest Policy

## 1. Policy statement

Safe Skills Training Ltd is committed to acting with integrity, impartiality, and professionalism in all business, training, assessment, quality assurance, procurement, and decision-making activities.

A conflict of interest can arise where personal interests, relationships, or external activities could improperly influence (or be perceived to influence) decisions made on behalf of Safe Skills Training Ltd. This policy sets out how conflicts are identified, declared, recorded, and managed.

## 2. Scope

This policy applies to anyone acting for or on behalf of Safe Skills Training Ltd, including:

- The Director/Lead Educator
- Employees (where applicable)
- Trainers/assessors
- Quality assurance roles
- Subcontractors/associates
- Suppliers and partners where they are involved in decision-making or delivery

It applies to conflicts relating to:

- Training delivery and assessment decisions
- Quality assurance and verification activities
- Candidate support and reasonable adjustments decisions
- Procurement and purchasing decisions
- Client selection, pricing, referrals, and commissions
- Recruitment and selection (where applicable)

## 3. Definitions

- **Conflict of interest:** A situation where a person's private interests (financial or non-financial) could interfere with their duty to act in the best interests of Safe Skills Training Ltd.
- **Actual conflict:** A conflict that is currently influencing, or is likely to influence, a decision.
- **Potential conflict:** A conflict that could arise in the future.

- **Perceived conflict:** A situation that could reasonably be seen by others as a conflict, even if no improper influence exists.

## 4. Principles

Safe Skills Training Ltd will manage conflicts in a way that is:

- **Transparent:** Conflicts are declared early.
- **Proportionate:** Controls match the level of risk.
- **Impartial:** Decisions are evidence-based and fair.
- **Documented:** Actions taken are recorded.
- **Consistent:** Similar situations are handled in similar ways.

## 5. Examples of conflicts of interest

Conflicts may include (but are not limited to):

- Assessing or making competency decisions for a family member, close friend, or someone you have a personal relationship with
- Delivering training to an organisation where you are also employed, contracted, or have a financial interest
- Referring business to a supplier/partner where you receive a personal benefit (e.g., commission, gifts, discounts)
- Procuring equipment/services from a supplier owned by a friend or relative
- Accepting gifts or hospitality that could influence (or appear to influence) professional judgement
- Holding a role in another organisation that competes with Safe Skills Training Ltd or creates divided loyalties
- Using confidential information gained through Safe Skills Training Ltd for personal gain

## 6. Declaring conflicts of interest

### 6.1 When to declare

A conflict must be declared as soon as it is identified, and always:

- Before training/assessment decisions are made
- Before procurement decisions are made
- Before accepting any gift/hospitality that may be more than nominal
- When circumstances change (e.g., new relationship, new external work)

## 6.2 How to declare

Conflicts should be declared in writing to:

- [andy@safeskillstraining.com](mailto:andy@safeskillstraining.com)

Declarations should include:

- The nature of the conflict (actual/potential/perceived)
- Who/what it relates to (client, candidate, supplier, etc.)
- The decision/activity affected
- Any proposed mitigation

## 7. Recording conflicts (Conflicts Register)

Safe Skills Training Ltd will maintain a **Conflicts of Interest Register**.

For simplicity (especially while operating as a solo provider), the register may be maintained as a single secure spreadsheet stored in a restricted-access folder.

## 8. Managing conflicts (controls and mitigations)

Where a conflict is declared, Safe Skills Training Ltd will decide and document appropriate controls. Options may include:

- **Removal from the decision:** The person does not assess, verify, or decide on the matter
- **Independent review:** A second competent person reviews the decision/evidence
- **Reallocation of duties:** Another trainer/assessor delivers or assesses where feasible
- **Enhanced documentation:** Clear evidence trail showing criteria applied and decisions made
- **Client transparency:** Disclosure to the client where appropriate (without breaching confidentiality)
- **Declining the work:** Where the conflict cannot be managed adequately

Where Safe Skills Training Ltd is operating with limited personnel, we will prioritise:

- Evidence-based decisions
- A documented rationale
- Independent input where reasonably practicable

## 9. Gifts, hospitality and incentives

### 9.1 General rule

Gifts, hospitality, or incentives must never be accepted if they could influence (or be perceived to influence) professional judgement.

### 9.2 Acceptable items

Nominal, infrequent items may be accepted where appropriate (e.g., tea/coffee on site, modest refreshments during delivery), provided they do not create an obligation.

### 9.3 Items requiring declaration

Any gift, hospitality, discount, or benefit that is more than nominal, repeated, or linked to a business decision must be declared and recorded in the Conflicts Register.

### 9.4 Prohibited items

Safe Skills Training Ltd will not accept:

- Cash or cash equivalents
- Gifts/hospitality offered in exchange for preferential treatment
- Any benefit that would compromise impartiality

## 10. Confidentiality and information handling

Individuals must not:

- Use Safe Skills Training Ltd information for personal gain
- Share confidential client/candidate information with friends, family, or external organisations without a lawful basis

Any concerns about misuse of information must be reported immediately.

## 11. Non-declaration and breaches

Failure to declare a conflict of interest may result in:

- Decisions being reviewed and, where necessary, corrected
- Removal from delivery/assessment/QA duties
- Termination of subcontractor arrangements (where applicable)
- Disciplinary action (where applicable)

Where a conflict may have affected candidate outcomes, Safe Skills Training Ltd will take prompt action to protect fairness and integrity.

## 12. Reporting concerns

Anyone may raise a concern about a potential conflict of interest by contacting:

- [andy@safeskillstraining.com](mailto:andy@safeskillstraining.com)

Concerns will be handled sensitively and confidentially, and retaliation for raising a concern in good faith is not permitted.

## 13. Review and version control

- **Policy owner:** Director/Lead Educator
- **Review frequency:** Annually, or sooner if business activities change (e.g., recruitment, subcontracting, new partnerships)

### Version control

Version	Date	Summary of changes
1.0	17/04/2026	First issue
1.1	17/04/2026	Added Conflicts of Interest Register template
1.2	17/04/2026	Removed register template from policy (maintained as separate spreadsheet)

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## Document header (for print)

**Safe Skills Training Ltd** Website: <https://www.safeskillstraining.com> Email: [andy@safeskillstraining.com](mailto:andy@safeskillstraining.com) Business phone: 0330 043 4663

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