



Date approved	February 2021
Approved by	Managing Director
Accessible to	Staff, External Stakeholders

Applicability of Policy

This policy applies to employees and workers in:

1. Worldwide Education Training Centre
2. Support Services
3. Any future business units or subsidiaries
4. Our stakeholders, including our customers

Scope and purpose of the Policy

This policy applies to all individuals working for or on behalf of Worldwide Education, including all colleagues at all locations and at all levels including members of the Management Team, external contractors, agency workers, partners, suppliers, centres, customers, any associates, any subsidiaries or their employees or any other person associated with us (collectively referred to in this document as 'individuals').

This policy covers conflicts of interest procedures that relate to potential learner-centric conflicts, such as teaching and assessment delivery.

This policy sets out the responsibilities on all individuals, in line with their contract of employment (or other contractual arrangement), in supporting us to meet the requirements set out by the Awarding Body.

This policy and associated procedure supports us in ensuring that working relationships with colleagues, stakeholders, partners and customers do not conflict with our requirement to engage in business relationships in a legal, transparent, ethical and responsible manner.

Worldwide Education recognises that conflicts of interest may arise that could lead to individuals making decisions, or appearing to make decisions, that are based on personal interest and not the interest of the organisation or what is ethically correct. Such conflicts of interest may also constitute a form of corruption. Worldwide Education has a policy on anti-bribery and corruption, which can be found on our website or, for internal staff, via the company intranet.

Policy Statement

For the purpose of this policy a conflict of interest is defined as a situation in which an individual, or organisation, has, or may be perceived to have competing interests or loyalties which could lead to a potentially subjective, biased or corrupt decision being made by that individual or organisation.

Worldwide Education recognise and encourage the promotion of building successful business and external relationships. In doing so, we are mindful that there may be situations when a perceived or potential conflict of interest may arise and that we have a duty to identify, manage and mitigate potential conflicts of interest. As such where a potential conflict may be identified we will follow the procedure outlined in this document.



Linked Policies

The policy should be read in conjunction with

- Anti-Bribery and Corruption Policy
- Whistleblowing Policy

Location and Access to the Policy

The Conflict of Interest Policy is located as follows:

- Intranet: Staff
- Website: Stakeholders

Persons Responsible for the Policy

- Managing Director
- Centre Manager

Conflicts of Interest Guidelines

1. Risk management in relation to conflicts of interest

Identified conflicts of interest are mitigated as far as possible, and are monitored as part of overall risk management and internal control processes.

2. Prevention of conflicts of interest

No colleague within Worldwide Education shall provide or accept preferential treatment (including discounts on services) to or from any colleague or any other part of Worldwide Education, where such a transaction may adversely affect the business; learners, centres or other relevant parties. Such actions may also be construed as bribery and may be subject to criminal prosecution.

3. Roles and responsibilities

To assist us in managing significant risks with regards to potential conflicts of interest, individuals must tell us about any relevant risk and/or issue in relation to a conflict of interest (or potential conflict) that has come to their attention. We appreciate that they may wish to do so in confidence and are asked to refer to our Whistleblowing policy (available on our website or on the company intranet) for more information.

Any person or body employed by, or acting on behalf of Worldwide Education is personally responsible for ensuring that they adhere to the policy and procedures in this document.

3.1 Our stakeholders (including customers and contractors)

In line with our contractual agreements, we expect our customers and contractors:

- to read and abide by the contents of this policy
- to adhere to any contractual arrangement you may have with us in relation to conflicts of interest



- to have a dedicated conflicts of interest policy and procedures which can be produced on request by our colleagues, including our contractors
- to fully adhere to those policies and procedures in the identification, minimisation and mitigation of risks relating to conflicts of interest
- to declare any relevant conflicts within their Organisation
- to tell us when an incident of, or a significant risk incident of a conflict of interest that may adversely affect Worldwide Education has been identified.

For our customers and centres, failure to comply with this policy and/or your Centre Agreement may lead to immediate termination of contract, in line with our established contractual agreements.

Conflict of Interest Procedures

Stakeholder conflicts

Stakeholders, including customers, should report risks or instances of conflicts of interest as per the conditions set out in their contract and/or Terms of Agreement. Major conflicts of interest that could adversely affect Worldwide Education should also be escalated to the Managing Director.

Internal Staff

If internal staff have a query relating to conflicts of interest which is not included in this policy, they must refer the matter to their immediate line manager in the first instance or a member of the Senior Leadership Team.

If a conflict of interest arises, or it is anticipated that one may arise, colleagues must inform their line manager or a Senior Leadership Team member in protection of the business and individuals. If there is any doubt whether or not an activity represents a conflict of interest, the matter should be raised in this way, in order that an objective assessment may be made. Concerns may be raised in confidence (subject to certain caveats, such as the requirement to disclose certain information to statutory bodies). Please see the Whistleblowing Policy for further information.

All potential conflicts of interest which relate directly to the colleague themselves, once discussed with their line manager, must be recorded by the line manager. The record must contain information on how the conflict of interest will be managed. Conflicts of Interest relating to another individual (e.g. such as conflicts reported under the Whistleblowing policy) will be recorded by the line manager/ Senior Leadership Team member, subject to confidentiality.

Management receiving a Conflict of Interest notification

All managers/senior colleagues receiving information on actual or potential conflicts of interest will ensure that potential conflicts not causing a significant risk to the business are appropriately recorded, monitored and managed.

Conflicts, or potential conflicts, that may pose a significant risk to the business must be escalated in confidence to the Managing Director, in order that appropriate steps may be taken to minimise any risks and where possible resolve the issue. Where conflicts relate to our staff, advice from the HR Department must be sought at the earliest opportunity by the most senior receiving manager



(usually a Senior Leadership Team /Executive member), particularly in relation to confidentially and securely recording the conflict.

The Management Team will ensure all employees, consultants and other relevant parties receive basic training regarding conflicts of interest and how to understand and avoid them where possible.

Internal staff are expected to devote their working time to Worldwide Education as outlined in their contract of employment. Any colleague considering undertaking additional paid work (on either an employed or self-employed basis) or voluntary work outside Worldwide Education must seek their line manager's written agreement beforehand, as stipulated in the colleague's contract of employment. Colleagues are not permitted to take on any such activities that could be deemed to compete or conflict with Worldwide Education's activities.

All other individuals (e.g. contractors) must follow the procedures contained within their contract for services.

Potential for conflicts with regards to NCFE qualifications

Colleagues engaged in a team or role which has access to qualification assessment materials, content or mark schemes may not be permitted to take an NCFE qualification due to the risk of a high conflict of interest and the potential impact on our regulatory requirements. Such colleagues must speak to their line manager prior to registering for an NCFE qualification.

Anyone who has access to confidential assessment material for a qualification is not permitted to deliver external training on that qualification. Such colleagues must consult with their line manager should they wish to attend these training events.

How to contact us

If you have a concern or query about conflicts of interest you can contact us via phone or email.

Worldwide Education

Unit 4 Waterside Drive

Langley SL3 6EZ

01753 306177*

compliance@worldwideeducation.co.uk

To report a conflict of interest please follow the procedure outlined in this document. If you have already collated evidence please also send this to us.

*To continue to improve our levels of customer service, telephone calls may be recorded for training and quality purposes.



Appendix A Illustrations of potential conflicts of interest

Conflicts of interest can arise in a variety of circumstances in relation to our business activity. These could include, but are not limited to the following illustrations:

- When an individual has a position of authority in any part of Worldwide Education, which conflicts with his or her interests in another organisation.
- When an individual has personal interests or relationships that conflict with his/her professional position.
- Where an individual works for or carries out work on Worldwide Education's behalf, but who may have personal interests, paid or unpaid, in another business which either uses Worldwide Education's products or services, or produces similar products to those of Worldwide Education.
- Where an individual takes on additional paid work (on either an employed or self-employed basis) or voluntary work outside Worldwide Education, which conflicts with the work of Worldwide Education.
- Where an individual works for or carries out work on Worldwide Education's behalf, who has friends or relatives taking assessments and/or examinations.