



Multi Trades Training

Staff Conflict of Interest Policy

Review Date: August 2026

Approved by	Rob Jones	Position	CEO
Signature		Date	15/08/2025

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Statement and Purpose

As an employer, Multi Trades Training ('Multi Trades', 'we', 'our' or 'the provider') recognises there is a risk of conflict of interest, or potential conflict of interest, in its appointment of staff, whether permanent or contractual.

It is the policy of Multi Trades that employees, contractors, consultants, and others acting on behalf of us should be free from conflicts of interest, or potential conflicts of interest, which could adversely influence their judgement, objectivity, loyalty to us and our stakeholders, including learners, when conducting all business, training and assessment activities.

In line with this, we adopt a three-hold approach:

- Encourage disclosure
- Manage and mitigate any conflict of interest
- Prohibit any activity necessary to protect the interest of Multi Trades

We recognise that employees and others, acting on behalf of the organisation may engage in a wide range of activities, for example, consultancy, or take part in legitimate financial, business, charitable and other activities outside Multi Trades.

While we recognise that these activities can bring many advantages, they also have the potential for diverting attention from the primary role and while most contracted staff are permitted to undertake private consultancy, therefore, we need to ensure that such work or consultancy should avoid actions, situations or relationships which might conflict, or appear to conflict, with their interests.

Scope

This policy applies to all employees and anyone acting for, or on behalf of, Multi Trades ("associated persons"), including temporary workers, consultants and contractors. Including, but not limited to:

- All staff, full, part-time and casual staff
- Individuals with visitor status
- External examiners and assessors
- Consultants and contractors
- Casual workers including agency workers
- Volunteers

Please note there is a specific policy which covers external members of the Board of Governors, GOV003 Governor Conflict of Interest.

Definitions

A conflict of interest may be defined as including:

'a conflict between the contractual and official responsibilities of a person in a position of trust and any other interests the particular individual may have'

e.g., where the individual could be seen to be influencing the matters of Multi Trades for actual or potential personal benefit or seeking such a gain at the expense of our organisation.

The definition is not restricted to those cases in which an individual betrays that trust but can also apply to those considered as damaging for the conflict to exist or appear to exist.

‘Interests’ include both direct and indirect interests of staff and individuals working for or with Multi Trades. Indirect interests are where the conflict involves the interests of a Connected Person.

A Connected Person is anyone with whom an individual has a personal or business relationship. This can include but is not limited to:

- Spouse/partner.
- Close relative (e.g., sibling, parent, grandparent, child or grandchild).
- Close friend.
- Business partner.
- A financial relationship (e.g., a pension) with an individual/business seeking to obtain funding.

A conflict of interest can be **actual or potential**.

An actual conflict is an existing situation or relationship that could compromise an individual’s impartiality, objectivity, or professional judgement in relation to their responsibilities to the University.

A potential conflict is a situation that currently does not constitute a conflict of interest but could evolve into an actual conflict situation.

Financial or non-financial Conflicts of Interest

A **financial interest** is where an individual receives, or may receive, a direct or indirect benefit of monetary value. Good practice is to disclose any financial interest, however small.

Examples of financial interests can include but are not limited to:

- Salary
- Commission
- consultancy fees
- gifts and hospitality
- equity interests or property, stocks and shares
- forgiveness of debt

A **non-financial** interest is where an individual receives, or may receive, a direct or indirect non-financial benefit.

Examples of non-financial interests include but are not limited to:

- enhancement of professional reputation,
- status or career
- any personal benefits not directly linked to professional career
- access to privileged information, facilities or property.

Potential conflicts of interest of employees and others acting on its behalf

There are 2 categories of conflict:

- Conflict of Interest (detailed below)
- Conflict of commitment – when the external activities are so demanding that the performance of the individual in their primary role with MTT is compromised.

The following are examples of potential conflicts of interest that could apply to employees and others acting on its behalf, the following are examples and not limited to, or exhaustive:

- using a position within Multi Trades to influence the results of an assessment, for example of a relative or acquaintance
- using company confidential information for personal gain or advantage
- having a second job or consulting relationship:
 - a) which could affect that person's ability to satisfactorily perform Multi Trades duties and obligations, or
 - b) with an employer, or other organisation, who is a direct or indirect competitor, customer or supplier of Multi Trades.

NB: If you should doubt whether a role could be classed as a possible conflict of interest, then you should disclose this.

Role and Responsibilities

It is the responsibility of all employees, contractors, and others acting for and on behalf of Multi Trades to disclose any conflict of interest, or potential conflict of interest, promptly to info@mttraining.co.uk

This includes seeking the approval prior to taking part in financial, business, charitable or other activities which may pose any conflict of interest, or potential conflict of interest.

All employees, contractors and others engaged by Multi Trades are required to complete a Conflict of Interest Disclosure annually, as well as being responsible for disclosing any conflict of interest, or potential conflict of interest, that may occur in the intervening period promptly.

Disciplinary action may be taken in cases of failure to disclose any conflict of interest, or potential conflict of interest.

The Conflict of Interest Disclosure Declaration (Appendix 1) will be held on file in accordance with the Data Protection Act 2018. (GDPR)

Procedure

Disclosure

It is the duty and responsibility of every member of Multi Trades to disclose any conflict of interest or any circumstances that might reasonably give rise to the perception of a conflict of interest.

Where an individual is unsure whether their interests conflict, or whether Multi Trades' interests conflict, it should be assumed that a conflict of interest exists.

The simple rule is: if in doubt, always disclose.

This includes seeking the approval prior to taking part in financial, business, charitable or other activities which may pose any conflict of interest, or potential conflict of interest.

All employees, contractors and others engaged by Multi Trades are required to complete a Conflict of Interest Disclosure annually, as well as being responsible for disclosing any conflict of interest, or potential conflict of interest, that may occur in the intervening period promptly.

Disciplinary action may be taken in cases of failure to disclose any conflict of interest, or potential conflict of interest.

The Conflict of Interest Disclosure Declaration will be held on file in accordance with the Data Protection Act 2018.

In other cases, to ensure that decisions are made in a fair and transparent way, more active management and mitigation may be required. This will depend on the nature and context of the interest, but could include:

- not taking part in decisions relating to certain matters, but still being present for any preceding discussion
- referring decision-making on certain matters to others
- divesting or placing in trust certain financial interests
- standing aside from any involvement in a particular project or assessment
- declaring an interest to a sponsor or third party
- removing oneself from assessment practices and outcomes

Communication

The disclosure of Conflicts of Interest is the responsibility of all those working for Multi Trades and mandatory training will be provided to all staff to ensure that they are aware of their obligations and responsibilities.

This policy will be communicated as part of all staff induction processes and as part of the annual Conflict of Interest Disclosure process

Monitoring and Review arrangements

Multi Trades will review the policy annually as part of our annual self-evaluation and assessment reporting (SAR) arrangements and revise as and when necessary.

Associated Policies

This policy should be read in conjunction with:

- Whistleblowing
- Malpractice and Maladministration
- Anti Bribery, Fraud and Corruption

Contact Information

By email to: info@mttraining.co.uk

Or by post to

Multi Trades Training Ltd
Unit 8
Moniton Trading Estate,
West Ham Lane,
Basingstoke,
Hampshire,
RG22 6NQ

Tel: +44 (0) 2034 883801
E: info@mttraining.co.uk

Document Control

Date	Review & Revision	Owner	Version
05/06/2023	No Revision	Quality Lead	V1 2023
18/07/2024	Address updated	Quality Lead	V1 2024
19/07/2025	General formatting updated	Quality Lead	V1 2025

Appendix 1

Conflict of Interest - Annual Declaration

1. Individual Details

Full name	
Role	

2. Conflicts of Interest

This annual declaration is to ensure that any perceived, potential or actual conflicts of interest are appropriately highlighted in order to ensure they are managed to mitigate any Adverse Effects.

Further information can be found in the Multi Trades Training (MTT) Conflicts of Interest Policy.

Please select either A or B (by inserting an 'X' in the box). If B is selected, the details in the box below require completing:

A - I do not have any perceived, potential or actual conflict/s of interest to declare	
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B - I have the following potential, potentially perceived or actual conflict/s of interest to declare	
<i>The type of interest</i>	
<i>The nature of the interest</i>	
<i>A description of all parties involved in the interest (financial or non-financial) and any other relevant information</i>	

I am aware that I remain under a continuing obligation to raise potential and / or actual conflicts of interest as they arise.

Should circumstances change after completion of this declaration, or new situations arise, I will promptly disclose the information to the Responsible Officers.

Signature	
Date	

3. Decision

The following section is to be completed by Multi Trades Training.

No Declarations - Accepted	
Declarations Made – Accepted – No Actions Needed	
Declarations Made – Accepted – Actions Noted	
Declarations Made - Not Accepted – Next Steps Noted	

This form and the information contained within it will be treated confidentially as far as is possible with information saved and shared only on a need to know basis and in line with the Data Protection Policy / Privacy Policy at Multi Trades.