

Public

Conflict of Interest Policy

1. Purpose

The purpose of this document is to set out Twinn's policy and the supporting procedures to be followed to ensure that staff are not placed in a situation where they suffer a conflict of interest.

2. Introduction

Twinn is committed to conducting its business with honesty and integrity, and as a result promotes an organisational culture from the top down that will not tolerate any situation that places the company or staff in a situation where they may suffer a conflict of interest.

The scope of this policy covers activities:

- A) Outside of the employees working contract that conflict with duties undertaken during working time
- B) That place an employee in a situation where they may maliciously or accidentally reveal commercially sensitive information to a competitor.
- C) Within the employees working contract that place the employee in a situation where they are responsible for the verification of their own work, where that verification would lead to financial payment.
- D) That mitigate risks and safeguard student achievements as well as staff and Company integrity and reputation. It also contributes to the maintenance of awarding body accreditation and certification.

3. Policy Statement

a) Conflict between duties and out of work activity

Twinn employees are allowed to undertake part time, weekend or other employment that does not interfere with their contractual obligations to the company. The following is taken from the Staff Handbook:

- 29.1.** You shall not be associated in any capacity with a business that carries out work of a similar type to the Company's, without the Company's prior written approval.
- 29.2.** If you choose to take up additional employment outside your normal working hours this shall be accepted by the Company, subject to the provisions above unless such additional employment is felt to have an adverse effect on the performance of your normal duties with the Company.
- 29.3.** If such additional employment is granted, the Company will need to know details of this in order that any additional hours worked, can be taken into consideration under the

Working Time Regulations.

If the employee is not certain if a conflict of interest may occur, they are encouraged to speak to their line manager and HR to agree clarification and a course of action. Employees are required to complete a confidentiality and non-disclosure agreement in addition to that covered during their induction. If it is found out that employees are engaging in any sort of external work activity during their Twin Contracted Hours, this will be treated as a case of Gross Misconduct.

a) Control of Twin Intellectual Property

In situations where Twin intellectual property or financial / performance related statistics are to be shared with a third party, authorisation must be gained from a senior management level employee prior to the exchange taking place.

For Twin Employment this includes: Chief Operating Officer and the Group Board.

For Twin Training International this includes: Chief Operating Officer, School Principals, Director of Studies, and the Group Board.

Third parties may be required to complete a confidentiality and non-disclosure agreement. It is the responsibility of the Senior Manager involved to ensure that the data is appropriate for the request, does not contain any client personal data where appropriate and is transmitted via a secure medium.

b) Separation of Duties

No member of staff shall be authorised to approve performance related contract outcome payments without independent verification of work done from the Claims Manager or other Independent Party.

Such representatives must have had no operational input into the work submitted for claim. They must not be targeted for the performance of the work submitted for claim. They must be operationally independent.

Examples of such representatives include but would not be limited to: Prime contractor auditors, Twin Auditors, Quality Assurance Staff, Claims Administrators.

c) Students and Staff

A conflict of interest occurs where the professional responsibilities and position of trust held by an individual or an organisation is compromised by the potential for personal gain or organizational benefit from a situation. E.g. If a member of staff is related to a student whose work they assess, there is a conflict of interest as they have a personal interest in their relative's achievement.

Activities related to managing a conflict of interest

Staff are trained in managing boundaries and related conflicts as part of their induction. Where there is potential for a conflict of interest, the awarding body will be notified, and their agreement requested prior to the start of the course. Any agreed conflict of interest will be recorded on a central log maintained by the Central Services Team.

Disclosure

It is important that staff and students recognise and disclose any situations that present a conflict of interest for example: teaching, assessing, internally verifying or invigilating an exam where a relative, friend or colleague is a student. Students completing an assessment or examination that is supervised or assessed by a member of staff who is a relative, carer or family friend.

Failure to disclose a conflict of interest

If a conflict of interest is identified that has not been disclosed the related examination or assessment will be invalidated and the staff or student disciplinary procedure will be activated. The qualification awarding body will be notified of the conflict of interest.

Procedure

The Head of Quality will take steps to manage the conflict e.g. provide an alternative assessor, internal verifier, invigilator or support worker who is not related to any student, inform the awarding body if the trainer is the only available specialist in that subject area to seek their permission and to arrange for any additional scrutiny to monitor fair and impartial approaches, record the conflict of interest in the conflict of interest log maintained by the Central Services Team, provide details of conflicts of interest to visiting External Quality Assurers and External Examiners or others associated with the awarding body for the relevant qualification.

If a student or staff member believes that a declaration of conflict of interest has not been managed correctly they may raise a complaint in line with the Complaint's Policy.

4. Outcome

Failure to comply with the instructions above may result in dismissal for gross misconduct for the member of staff concerned.

The policy applies to all Twin Group companies.