

(NOTE: Throughout this document, THE TEACHER TRAINER LTD is referred to as TTT)

TTT POLICY DOCUMENT

Conflict of Interest Policy

How TTT identifies, declares and manages personal, professional and financial conflicts of interest.

Document Control

Document Title	Conflict of Interest Policy
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Policy Owner	Phenil Mehta, Centre Manager
Declarations Contact	phenil@theteachertrainer.co.uk
Approved By	Phenil Mehta, Centre Manager
Classification	Public
Applies To	All TTT staff, associates, contractors, Course Tutors, Assessors, IQAs, Centre Manager and any director or officer

Conflict of Interest Policy

1. Purpose

This policy sets out how TTT identifies, declares and manages conflicts of interest that could bias or appear to bias a TTT decision. It protects the integrity of TTT's assessment, IQA, procurement and commercial decisions and supports compliance with Ofqual conditions and Awarding Organisation centre requirements.

2. Scope

This policy applies to:

- All TTT employees, associates, contractors, Course Tutors, Assessors, IQAs, the Centre Manager and any director or officer
- Every TTT activity where a decision could be affected by personal, professional or financial interest, including assessment, IQA, recruitment, procurement, resale, marketing and policy-making

3. Definitions

The following terms carry the meanings given throughout this policy.

Conflict of Interest	Any situation where an individual's personal, professional or financial interest could influence or appear to influence, their judgement on a TTT matter.
Actual Conflict	A conflict that currently exists.
Potential Conflict	A conflict that may arise in the future depending on events.
Perceived Conflict	A situation in which a reasonable observer could conclude that a conflict exists, even if it does not.
Declaration	A written statement by the individual describing the interest and how it relates to their TTT role.
Register of Interests	The central record TTT maintains of all declared interests.
Close Personal Relationship	A family, romantic, close friendship or financial relationship with an individual who is a TTT learner, colleague, supplier or competitor.

4. Policy Statement

TTT is committed to the following principles and commitments.

1. Every individual in scope makes a full written declaration of potential, actual and perceived conflicts of interest on appointment and annually thereafter.
2. New or changed interests are declared in writing to the Centre Manager as soon as reasonably practicable after they arise.

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3. TTT operates on the principle that disclosure is protective; failure to declare is a breach of the Staff Code of Conduct.
 4. Where a conflict exists, the individual does not participate in the affected decision and is not privy to the relevant deliberation.
 5. Conflicts are managed proportionately: minor, well-managed conflicts may be recorded and monitored; serious conflicts trigger reassignment, recusal or, in some cases, termination of the engagement.
 6. Conflicts are never used as a reason to penalise a learner; TTT safeguards the affected learner's interests through reassignment or independent review.
 7. The Register of Interests is reviewed annually by the Centre Manager and is available to Awarding Organisations and EQAs on request.

5. Examples of Conflicts of Interest

The following are illustrative, not exhaustive.

- A Course Assessor or IQA who is a family member, partner, close friend or current or former employer of the learner being assessed
- A staff member with a significant shareholding in a competitor, reseller, supplier or partner of TTT
- A staff member offering paid private tuition or assignment-writing services to TTT learners
- A staff member simultaneously employed by a competing provider offering the same qualifications
- A decision on staff pay or conditions where a close personal relationship exists between the decision-maker and an affected individual
- A staff member receiving a gift, hospitality or favour from a learner, supplier or reseller that could influence a decision
- The Centre Manager being asked to approve a contract with a company owned by a family member
- A member of an IQA sample panel reviewing work they themselves marked

6. Declaring a Conflict

6.1 On appointment

- Every new staff member, associate or contractor completes an Initial Declaration of Interests covering: other employment; directorships and shareholdings; family members working in the sector or as TTT learners; ongoing commercial or professional relationships; any other matter relevant to TTT's work
- The declaration is kept on the personal file and entered on the Register of Interests

6.2 Annually

- Each year, in parallel with the staff annual review, the declaration is refreshed; nil returns are also recorded

6.3 As soon as a new conflict arises

- Any newly arising interest is declared in writing to the Centre Manager within 5 working days of becoming aware of it
- For conflicts that arise during a specific meeting or activity, the individual declares at the start of the meeting and the conflict is recorded in the minutes

7. Managing a Conflict

The Centre Manager, on receiving a declaration, decides the proportionate management approach.

Level of Risk	Typical Management Approach
Low (minor, historic or remote)	Recorded on the Register; monitored; no other action
Medium (active, could reasonably affect a decision)	Individual recuses from the affected decision; alternative staff member takes the role; outcome documented
High (direct financial or close personal interest)	Reassignment of the entire activity; independent review of affected decisions; in some cases, suspension of the individual from the matter altogether
Unmanageable	Termination of the engagement or contract where no adequate mitigation is possible

8. Specific Arrangements for Assessment and IQA

- A Course Assessor does not assess a learner with whom they have a close personal relationship; the assessment is reassigned
- At TTT, the Centre Manager and primary Assessor (Phenil Mehta) and the IQA (Shaily Mehta) are married. TTT acknowledges this as a standing conflict of interest and manages it through full transparency rather than reassignment. This arrangement has been disclosed to each relevant Awarding Organisation in writing and TTT operates with their knowledge of it. The conflict is recorded on the Register of Interests, reviewed annually and made available to EQAs on request.
- Where Shiera Mae Irizari acts as primary Assessor for TTT qualifications and Phenil Mehta acts as IQA, no conflict of interest exists between these two individuals. This arrangement operates under standard TTT assessment and IQA procedures without any requirement for reassignment or external review.
- Decisions made with any identified conflict are flagged to the EQA at the next visit

9. Gifts, Hospitality and External Work

- Gifts and hospitality are handled under the Anti-Bribery and Corruption Policy
- External teaching, assessing or consulting work is declared under this policy and must not conflict with TTT duties; approval is required from the Centre Manager for activity that could compete with TTT

- Shareholdings or directorships in competitors, suppliers or resellers must be disclosed and, where material, divested or managed by recusal

10. Learner Rights and Appeals

- Learners have the right to an assessment free from bias; where a learner suspects a conflict of interest has affected an assessment decision, they may challenge it under the Appeals Policy
- TTT investigates such concerns seriously and takes proportionate action; outcomes are documented

11. Roles and Responsibilities

Role	Responsibility
Centre Manager (Phenil Mehta)	Overall accountability; maintains the Register of Interests; decides proportionate management; declares own interests to Shaily Mehta for independent review; reports to Awarding Organisations where required.
Course Coordinator	Administers the Register of Interests; prompts declarations at appointment, annually and around specific decisions; supports record-keeping at meetings.
All staff, associates and contractors	Declare interests proactively and fully; recuse from affected decisions; raise concerns about others' conflicts via the Staff Code of Conduct and the Whistleblowing Policy.

12. Breach of This Policy

Failure to declare a conflict of interest or participating in a decision from which the individual should have recused, is a serious matter handled under the Staff Disciplinary and Sanctions Policy. Where the breach affects an assessment outcome, it is also investigated under the Malpractice and Maladministration Policy and reported to the Awarding Organisation where required.

13. Records and Retention

- The Register of Interests is retained for the life of the organisation and updated continuously
- Individual declarations, decisions on management and minutes noting recusals are retained for 6 years after the individual leaves or the matter closes, whichever is later, per the Data Retention and Disposal Policy

14. Monitoring and Review

This policy is reviewed annually by the Centre Manager as part of TTT's self-evaluation process. Interim reviews are triggered by Awarding Organisation changes, Ofqual expectations, a significant case or organisational restructure. All outcomes are recorded in the Version History at Section 16.

15. Related Documents

This policy should be read alongside:

- Staff Code of Conduct
- Staff Disciplinary and Sanctions Policy
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy
- Safer Recruitment Policy
- Assessment Policy
- Internal Quality Assurance (IQA) Policy
- External Quality Assurance (EQA) Policy
- Malpractice and Maladministration Policy
- Appeals Policy
- Reseller Policy and Agreement
- Data Retention and Disposal Policy

16. Version History

Version	Date	Author	Summary of Changes
1.0	22/04/2026	Phenil Mehta	Supersedes prior Conflict of Interest Policy dated 07/04/2026. Definitions expanded to include actual, potential and perceived conflicts. Risk-based management table added. Assessment/IQA-specific arrangements, annual and ad-hoc declaration requirements and Register of Interests formalised.

17. Approval

This policy has been reviewed and approved by the Centre Manager of TTT.

Phenil Mehta
Name

P Mehta
Signature

22/04/2026
Date