

## Conflict of Interest Policy and Procedure

Revision	Date	Comments	Approved By	Review Due
0	31st March 2023	Initial Issue	D Holmes	31st March 2024
1	15 <sup>th</sup> September 2023	Apprenticeship Delivery Manager in post	C Pape	15 <sup>th</sup> September 2024
2	6 <sup>th</sup> November 2025	Update by Head of Technical College	C Oliff	6 <sup>th</sup> November 2026

### 1.0 Policy Statement

KLM UK Engineering recognises and encourages the promotion of building successful 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.

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.

### 2.0 Application

This policy applies to all individuals working for or on behalf of KLM UK Engineering, including colleagues at all locations and at all levels including members of the board, senior management, external contractors, agency workers, governors, 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 extends to all of KLM UK Engineering's dealings and transactions in all countries in which it or its consultants, partners, stakeholders and associates operate. It supports specific conflicts of interest procedures that relate to potential learner-centric conflicts, such as teaching and assessment delivery.

This policy sets out the responsibilities of all individuals in line with their contract of employment, or other contractual arrangement. This, and the 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.

### 3.0 Policy purpose and aims

The purpose of this policy is to ensure that all to all individuals working for or on behalf of KLM UK Engineering are aware of the procedures they must follow to ensure that conflicts of interest are identified, managed and mitigated.

#### **4.0 Linked policies**

- KLM UK Engineering Whistleblowing Policy
- KLM UK Engineering Assessment Policy
- KLM UK Appeals Policy
- KLM UK Engineering Complaints Policy
- KLM UK Engineering Malpractice and Maladministration Policy

#### **5.0 Roles and responsibilities**

##### **5.1 College staff and students**

The Head of Technical College is responsible for ensuring this document is complied with by managers. Line managers are responsible for ensuring that those they manage are aware of this policy and associated procedures documented in annex 1.

##### **5.3 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 and associated procedures documented in annex 1.
- To adhere to any contractual arrangement, they may have with us in relation to conflicts of interest
- To have a dedicated conflicts of interest policy and procedures which can be produced upon request
- To fully adhere to the procedures in the identification, minimisation and mitigation of risks relating to conflicts of interest
- To tell us when an incident of, or a significant risk incident of a conflict of interest that may adversely affect KLM UK Engineering has been identified.

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.

#### **6.0 Conflicts of Interest Guidelines**

Here are some examples of conflicts of interest (this is not an exhaustive list):

- When an individual has a position of authority in one organisation that conflicts with their interests in KLM UK Engineering
- Where decision making may be compromised because of personal relationships, for example, where a tutor/assessor at KLM UK Engineering delivering a qualification where a family member is one of the learners

- Interest in any activity that could potentially lead KLM UK Engineering to act contradictory to its interest in developing, delivering and awarding its products and services
- When an individual has interests that conflict with their professional position
- Where an individual is undertaking the end-point assessment of apprentices, and have previously trained, managed or assessed the same apprentice(s), during the 'on programme' phase of their apprenticeship.

Conflicts of interest can:

- Inhibit free discussion
- Result in decisions or actions that are not in the interests of the centre, learners, awarding organisation, EPAO or the employer
- Put at risk KLM UK reputation that it may have acted improperly.

A conflict of interest can appear in the form of:

- Direct financial gain
- Indirect financial gain e.g. a service or contract is awarded to a relative
- Non-financial gain when the beneficiary of a service, award or donation is an employee, contractor or trustee
- Lack of challenge to decision-making where it impacts a relative

## **7.0 Risk management in relation to conflicts of interest**

Assessing the risks to KLM UK Engineering arising from potential conflicts of interest is an integral part of the ongoing risk management process. Identified conflicts of interest are mitigated as far as possible and are monitored as part of overall risk management and internal control processes.

Annual reviews of our conflicts of interest policy and procedures are undertaken as part of our governance and accountability processes. All existing and reasonably foreseeable conflicts of interest will be identified, documented and monitored by our organisation in line with this procedure and escalated to member of Leadership Team as required.

Documented conflicts of interest will be monitored closely, particularly during periods of change, in order to mitigate the possible impact of any potential adverse effect.

## **8.0 Prevention of conflicts of interest within KLM UK Engineering**

No colleague within shall provide or accept preferential treatment (including discounts on services) to or from any colleague or any other part of KLM UK Engineering, 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.

All applicants to positions within the Technical College will be asked about conflicts of interest upon application. Should these be discovered, they will be asked to complete a conflict-of-interest form. These will be documented in the conflicts of interest register.

## **10.0 Monitoring and reviewing our policy and practice**

This policy will be reviewed annually, or in line with changes to relevant guidance material.

## **Annex 1**

### **Reporting a Conflict-of-Interest Procedure**

#### **Students**

If a conflict of interest arises, or it is anticipated that one may arise, colleagues must inform their line manager to protect the business and individuals. If there is any doubt whether 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, should be referred to HR. Conflicts of interest relating to another individual (e.g. such as conflicts reported under the Whistleblowing Policy) will be recorded by the receiving manager, subject to confidentiality (receiving managers should seek advice from the Director of HR), particularly in relation to the confidential recording of information.

#### **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 recorded, monitored and managed. All information referring to an actual or potential conflict of interest should be recorded using the Conflict-of-Interest Form and shared with the Head of Technical College, who will record this on the Conflict-of-Interest Register.

Conflicts, or potential conflicts, that may pose a significant risk to the business must be escalated in confidence to the Leadership Team, in order that appropriate steps may be taken to minimise any risks and where possible resolve the issue. Where conflicts relate to our staff or member(s) of the Board, advice from the Director of HR must be sought at the earliest opportunity by the most senior receiving manager, particularly in relation to confidentially and securely recording the conflict.

The Director of HR will support the evaluation of whether any identified significant risks may result in a specified adverse effect that requires reporting to the appropriate regulator(s). Cases which may introduce other regulatory risks (e.g. those governed by other specific legislation) will also be escalated by the most senior receiving manager to the appropriate Leadership Team member. This will allow the evaluation of whether external specialist advice is required in assessing/mitigating the risk.