

Conflict of interest

1. Purpose

The purpose of this policy is to enable Propertymark Qualifications to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of its qualifications and manage risk.

2. Objective

Propertymark Qualifications aims to ensure that staff are aware of their obligations to disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of Propertymark Qualifications.

3. Scope

This policy applies to the employees of Propertymark Qualifications, whether permanent, temporary or contracted and whether paid or unpaid. These roles include, but are not limited to:

- Employees of Propertymark Qualifications
- Examiners contracted to carry out work on behalf of Propertymark Qualifications
- Members of the Governing Body
- All End-point assessment personnel
- Stakeholders to include Apprentices and Employers
- Employees of Propertymark Qualifications recognised centres.

4. Definition of conflicts of interests

A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of the organisation. Personal interests include direct interests as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, as a shareholder). A conflict of interest may be actual, potential or perceived and may be financial or non-financial.

These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of Propertymark Qualifications and must be managed accordingly.

5. Policy

This policy has been developed because conflicts of interest commonly arise, and do not need to present a problem to Propertymark Qualifications if they are openly and effectively managed. It is the policy of Propertymark Qualifications that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with the obligations to the organisation.

Propertymark Qualifications will manage conflicts of interest by requiring employees to:

- avoid conflicts of interest where possible
- identify and disclose any conflicts of interest
- carefully manage any conflicts of interest, and
- follow this policy and respond to any breaches.

6. Declaring a Conflict of Interest

- All new employees are required to complete a Conflict of Interest form prior to undertaking any work at Propertymark Qualifications.
- Subsequently, employees will be required to complete a Conflict of Interest form annually
- Should an employee's circumstances change, they must inform the Head of Qualifications as soon as is feasible, and prior to completing any further work for Propertymark Qualifications.

7. Responsibilities of Staff

It is the responsibility of all employees of Propertymark Qualifications to ensure that they are familiar with what constitutes conflict of interest, how to declare such an interest, and inform Propertymark Qualifications of such an interest as it occurs.

8. Responsibility of the Head of Qualifications

The Head of Qualifications is responsible for:

- establishing a system for identifying, disclosing and managing conflicts of interest across the organisation
- monitoring compliance with this policy, and
- reviewing this policy on an annual basis to ensure that the policy is operating effectively.

9. Identification and disclosure of conflicts of interest

Once an actual, potential or perceived conflict of interest is identified, it must be entered into the Propertymark Qualifications conflict of interest register. The conflict of interest register must record information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it).

10. Action required for management of conflicts of interest

- In deciding what approach to take, the Head of Qualifications will consider whether the conflict needs to be avoided or simply documented
- Whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making
- Alternative options to avoid the conflict
- The organisation's objects and resources, and
- The possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, the organisation.

11. Compliance with this policy

- If the Head of Qualifications has a reason to believe that a person subject to the policy has failed to comply with it, they will investigate the circumstances.
- If it is found that this person has failed to disclose a conflict of interest, action may be taken.
- If a person suspects that an employee has failed to disclose a conflict of interest, they must notify the Head of Qualifications as soon as is possible.