



## **Conflicts of Interest Policy**

### **Introduction**

The document outlines both our:

- broad approach to identifying and monitoring all actual/potential conflicts of interest that may affect PMI both now and in the foreseeable future; and
- the possible conflicts of interest that have been identified to date and the arrangements in place to prevent these from occurring.

It may from time to time be provided to the regulators upon request to satisfy them of our ability to comply with their requirements in relation to conflicts of interest and to prevent such conflict becoming 'Adverse Effects' (as defined by the regulators).

### **Review arrangements**

We'll review this document quarterly as part of our self-evaluation arrangements. However, a review will be commissioned earlier should an issue arise in relation to an actual or potential conflict of interest and/or in response to customer, learner or regulatory feedback.

### **Definition of a conflict of interest**

For the purposes of this policy we have adopted the definition used by the regulatory authorities in relation to conflict of interests. In essence a conflict of interest exists in relation to PMI where:

- its interests in any activity undertaken by it, on its behalf, or by a member of its staff have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications in accordance with the requirements of the regulator's Conditions of Recognition,
- a person who is connected to the development, delivery or award of qualifications at PMI has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award and impact on our compliance with the requirements of the regulator's Conditions of Recognition,
- an informed and reasonable observer would conclude that either of these situations was the case.



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### **Overview**

As an organisation that keeps all aspects of its business under review, individual teams are expected to identify and inform the Board of any actual/potential conflicts of interest that could impact PMI, and which are not already identified in the table at the end of this policy.

In addition, Managers are required to manage and monitor any identified conflicts of interest that relate to their area of operations (as outlined in the table at the end of this document). Should the status of any identified conflict, or the associated controls change, then the manager for the team should inform the Responsible Officer so they can update, as required, the details in the table below.

Overall our compliance with regard to identifying and managing any conflicts of interest will be reviewed regularly by the Lifelong Learning Committee and the log of conflicts will be kept by the Responsible Officer.

### **Conflict of interest principles**

In implementing our approach to identifying and managing actual/potential conflicts of interest staff are required to abide by the following principles:

- All managers and staff must buy into and commit to identifying and managing all actual/potential conflicts of interest that may affect PMI and in doing so raise possible conflicts of interest with the Lifelong Learning Committee if in doubt
- Staff must be proactive in the identification and management of conflicts of interest that may affect our effectiveness, level of regulatory compliance and/or reputation.
- Staff must be open about the nature of any potential/actual conflicts of interest and not try to hide or present them in a better light – managing conflicts of interest is about preventing issues from occurring that may impact on our operational effectiveness and/or regulatory compliance
- Strive to identify and deal with conflicts of interest sooner rather than later
- Our controls to managing any potential conflicts of interest must be proportionate to the risks associated with the identified conflict(s)



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**Conflicts of interest can arise in a variety of circumstances relating to PMI activity.**

The following are examples of conflicts and do not represent an exhaustive list:

- Where the training delivery function and the awarding function rest within one organisation
- When an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation
- Where someone works for or carries out work on our behalf, who has friends or relative taking our assessments or exams
- When an individual has interests that conflict with his or her professional position
- Where someone works for or carries out work on our behalf but may have personal interests –paid or unpaid- in another business which either uses our products and services, or produces similar products.

### **Dealing with conflicts of interests and/or breaches to the procedures outlined in this policy**

Should the Line Manager and/or Responsible Officer believe there has been a breach of this policy, or unforeseen conflicts of interest emerge the Lifelong Learning Committee must be informed, and an investigation carried out immediately along with a review of the associated procedures.

Should an external party feel there has been an actual conflict of interest involving PMI then they should raise the matter with Responsible Officer who will begin an investigation in accordance with the escalation arrangements in the log shown below.

The relevant manager will then lead on an investigation into the incident and will ensure that the person(s) assigned to the investigation have no personal involvement/interest in the allegation.

Details of the incident, investigation and updated controls will be recorded in the relevant record in the conflicts of interest log. Upon updating the record in the system (or adding a new record) the system will send an email alert to all members of the Management team to inform them of the change.



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If the breach is also classified as an Adverse Effect then the Responsible Officer, must promptly inform Ofqual in accordance with our procedure for dealing with Adverse Effects (see Governance Manual for further details). In doing, they will inform Ofqual of the reasonable steps that we have taken or intend to take to prevent, correct or mitigate the Adverse Effect. Including details of any reviews we are/will carry out. For information, the Ofqual definition of an Adverse Effect is:

*An act, omission, event, incident, or circumstance has an Adverse Effect if it –*

*(A) gives rise to prejudice to Learners or potential Learners, or  
(B) adversely affects –*

- (i) the ability of the awarding organisation to undertake the development, delivery or award of qualifications in accordance with its Conditions of Recognition,*
- (ii) the standards of qualifications which the awarding organisation makes available or proposes to make available, or*
- (iii) public confidence in qualifications.*

### **Reporting on our arrangements**

Due to the potential for possible/actual conflicts of interest within company all the committee and Board meetings will have a standard agenda item to review/receive an update on our arrangements for preventing/dealing with possible scenarios.

The meetings will have access to, and will review; the conflicts of interest log in the system (as illustrated above) per meeting.

### **Contact**

If you have any queries about the contents of the policy, please contact [mauddin@pensions-pmi.org.uk](mailto:mauddin@pensions-pmi.org.uk) with the subject title "Conflict of Interest"

<b>Potential conflict of interest</b>	<b>Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible</b>	<b>Responsibility for monitoring this process</b>	<b>Escalate to (if an incident occurs)</b>
<p>Members of the Board, Senior Management Team may unduly influence decisions so as to ensure a personal or commercial material benefit (e.g. in relation to interests they may have which are external to PMI ).</p>	<p>Senior staff – including Board members – are required to declare any potential conflicts of interest at their interview and appointment stage and also if circumstances change once they begin to work for us. In addition, we will undertake a quarterly check with each staff/Board member to proactively check and identify potential and/or actual conflicts of interest that may have emerged in the interim period (e.g. ask them to re-sign the declaration statement).</p> <p>Also, all staff and members in attendance at PMI meetings will be required to declare, at the beginning of a meeting, any private interest which s/he has in an item to be discussed, and certainly before any discussion of the item. This 'declaration of possible conflicts of interest' will be a standard item on all agenda.</p> <p>In doing so they will then abstain from any vote/decision that may pose a conflict of interest to the member – especially where they may directly or indirectly receive a material benefit from the decision and/or has a conflict in loyalties (e.g. their overriding duty is to act in the best interests of the other party). They may be allowed</p>		

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	<p>to engage in the discussion if the other members do not object and/or they possible conflict is already known to the rest of the members/attendees.</p> <p>Agenda items that are confidential and would cause a conflict of interest if raised in front of all members of the meeting (e.g. SMT) are discussed outside of the meeting in 1-2-1's etc with the member deemed to have a 'conflict' excluded from the discussions/review.</p> <p>All decisions under a conflict of interest will be recorded by the meeting secretariat and reported in the minutes of the meeting with details of:</p> <ul style="list-style-type: none"> <li>▪ the nature and extent of the conflict;</li> <li>▪ an outline of the discussion;</li> <li>▪ the actions taken to manage the conflict.</li> </ul> <p>Access to documentation that is deemed confidential and/or may lead to a possible conflict of interest are restricted in their circulation before and after the meetings.</p> <p>Also, where a group has a member who also works</p>		

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	for a centre (e.g. college) PMI will ensure that any reports/issues presented to the group that relate to specific centres will be anonymous in that they will have centre names removed/redacted.		
Investigations into possible conflicts of interest into direct/indirect members of PMI are carried out by someone who may have a vested interest in the outcome.	<p>PMI ensures that all complaints are reviewed by the Responsible Officer and they are responsible for assigning a relevant member of staff to lead on and/or be involved in the investigation.</p> <p>At all times they will ensure that the personnel assigned to the investigation will have the appropriate level of training and competence and they have had no previous involvement or personal interest in the matter.</p>	Naresh	
Staff may have a conflict of interest that impacts on their ability to carry out their role appropriately, consistently and with integrity.	<p>All staff at PMI are committed to carrying out their role to the best of their ability and are aware of the need to identify and manage any potential conflicts of interest.</p> <p>Staff and members of the Board and other committees must declare any possible conflicts they have in the Register of Interests upon starting work with PMI and update this should their circumstances change by completing and submitting a new Declaration of interest form (see</p>		

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	<p>Appendix 1). The Compliance Officer is responsible for maintaining the Register of Interests. In support of this we will undertake a quarterly check with staff to proactively check and identify potential and/or actual conflicts of interest that may have emerged in the interim period (e.g. ask them to re-sign the declaration statement at their appraisal meeting).</p> <p>In addition, to ensure that PMI actively reduces the risk of conflicts of interest arising amongst staff and the activities they undertake we expect staff to comply with the spirit of the Nolan Principles of public life. Namely:</p> <ul style="list-style-type: none"> <li>▪ Selflessness - staff have a general duty to act in the best interests of the organisation.</li> <li>▪ Integrity - staff should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their role.</li> <li>▪ Objectivity - in carrying out their role, staff should ensure that decisions are made solely on merit.</li> </ul>		



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	<ul style="list-style-type: none"> <li>▪ Accountability – staff are accountable for their decisions and actions.</li> <li>▪ Openness – staff should be as open as possible about their decisions and action that they take. They should, where appropriate, give reasons for their decisions and restrict information only when the wider interest or procedure clearly demands.</li> <li>▪ Honesty – staff have a duty to declare any interests relating to their role in our Register of Interests and to take steps to resolve any conflicts that may arise.</li> <li>▪ Leadership – staff should have a good working relationship with colleagues and provide appropriate leadership and professionalism when carrying out their own role.</li> </ul>		
Quality assurance staff (e.g. EVs) involved in the design of assessments (e.g. examiners) fail to highlight issues with the delivery of the	All staff at PMI are committed to carrying out their role to the best of their ability and are aware of the need to identify and manage any potential conflicts of interest.		

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<p>assessments when they carry out their quality assurance role (e.g. they may be less likely to identify adverse issues with the assessments they were involved in the design and development).</p>	<p>The work of all EVs is subject to review by the Responsible Officer, to ensure that they have carried out their role effectively and consistently as they would with qualifications/assessments they have had no involvement within their design.</p> <p>In particular, the Responsible Officer will consider, as part of our ongoing standardisation and review arrangements, the nature of the findings/reports/activities of such individuals to ensure they have acted consistently and appropriately.</p>		
<p>Staff involved in the design of assessments knowingly or unknowingly disclose confidential information about the assessments to unauthorised individuals or organisations or at external events or through resources/materials (e.g. training events).</p>	<p>All staff at PMI are committed to carrying out their role to the best of their ability and are aware of the need to identify and manage any potential conflicts of interest. Their work is subject to review by their line manager to ensure that they have carried out their role effectively and consistently in accordance with agreed expectations.</p> <p>Third parties sign appropriate confidentiality and/or non-disclosure agreements as part of their contract or as part of a separate document.</p>		

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	<p>The contract/service agreement/role specification for staff/third parties in involved in the development of confidential assessments:</p> <ul style="list-style-type: none"> <li>• Have confidentiality clauses/expectations that aim to ensure that such confidentiality is maintained, and which will be in force after the leave PMI</li> <li>• Outlines that ensure they must not provide or endorse any prohibited training, and do not provide or endorse any prohibited training (or seek approval/endorsement from PMI staff or those connected to PMI).</li> </ul> <p>Should an issue arise that suggests a conflict of interest and/or breach of confidentiality (including through the loss or theft of confidential assessment materials) is either suspected or alleged by any other person and where there are reasonable grounds for that suspicion or allegation, the Responsible Officer will be informed and will investigate that breach rigorously, effectively, and by someone of appropriate competence who has no personal interest in its outcome. The investigation will, so far as possible, establish whether or not a breach of such confidentiality or</p>		

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	<p>conflict of interest has occurred and highlight the action(s) that need to be taken.</p> <p>In addition, and where appropriate, third parties or permanent staff involved in the design of assessments:</p> <ul style="list-style-type: none"> <li>• Will be appropriately trained by PMI in relation to how to protect the confidentiality of assessment materials – including the preparation of any resources designed to support the preparation of actual/potential learners for the assessment of a PMI qualification in which they have access to confidential information.</li> <li>• Have a contract/service agreement/role specification that clearly set out their obligations in terms of declaring conflicts of interest in relation to other activities they undertake.</li> <li>• Have a contract/service agreement/role specification that requires them to promptly notify PMI of all instances in which they have been or are currently involved in the preparation of a resource designed to</li> </ul>		

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	<p>support the preparation of actual/potential learners for the assessment of a PMI qualification – especially if they had/have access to confidential assessment materials/information (this does not apply to the preparation of teaching resources or materials that s/he uses for learners they teach – although they are still bound by the confidentiality clauses of the contract/agreement in relation to confidential information they may have had access too). This requirement will also be applicable to when they leave the employment of PMI.</p> <ul style="list-style-type: none"> <li>• Will have their assessments they set monitored by PMI if they are, or have been, involved in the preparation of a resource designed to support the preparation of actual/potential learners for the assessment of a PMI qualification to ensure the fitness for purpose of the assessment has not been compromised by the 'resource' – especially if they have/had access to confidential assessment materials/information (this does not apply to the preparation of teaching resources or materials that s/he uses for</li> </ul>		

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	<p>learners they teach – although they are still bound by the confidentiality clauses of the contract/agreement).</p> <ul style="list-style-type: none"> <li>• Be monitored to ensure that access to confidential information that they may have in relation to a qualification does not compromise the confidentiality of assessment materials for the qualification when they design/develop resources designed to support the preparation of actual/potential learners for the assessment of a PMI qualification</li> </ul> <p>The above relates primarily to someone classified as 'senior examiner' which is defined by the regulators as (but this is not exclusive and will ensure the above arrangements apply to all staff involved in such processes):</p> <ul style="list-style-type: none"> <li>• Chair of examiners – the person responsible to PMI for maintaining standards across different specifications in a subject within a qualification and from year to year.</li> <li>• Chief examiners – the person responsible to the chair of examiners for ensuring that the assessments for a qualification meet the</li> </ul>		

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	<p>requirements of the specification and maintain standards from year to year.</p> <ul style="list-style-type: none"> <li>• Principal examiners - in relation to each unit or component of a qualification, the person responsible for the setting of the question paper/task and the standards of its marking.</li> </ul>		
<p>Allocating External Verifiers to centres that may have a conflict of interest such as:</p> <ul style="list-style-type: none"> <li>▪ has worked for the centre,</li> <li>▪ has worked for a competitor centre,</li> <li>▪ has a family member working at the centre?</li> <li>▪ has a financial stake or shares in the centre</li> <li>▪ is a governor at the centre?</li> </ul>	<p>PMI will record the details of any actual/potential conflicts of interest in the EV's profile record and this will be checked when centres are allocated by the Senior Officer Qualifications, to ensure an EV is not allocated to a centre at which they have had or have a personal interest.</p> <p>Where this cannot be avoided, The Responsible Officer will scrutinise the work of the EV at the centre to ensure no conflicts have occurred.</p>		
<p>Ensuring that staff involved in sales do not</p>	<p>The Commercial Director and team are only tasked with identifying potential prospects and</p>		

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<p>unduly influence the centre recognition/qualification approval processes in a way that would pose a risk to learners, the integrity of our qualifications and the reputation of PMI in order to achieve the sale and/or receive commission.</p>	<p>informing them of the range of services and qualifications offered by PMI.</p> <p>They will have no role in the formal decision of granting centre recognition – this process and the final recognition will be managed by the Responsible Officer. With recognition only issued once the centre meets the requirements of our centre recognition process.</p>		
<p>Ensuring assessments are not undertaken by any person who has a personal interest in the result of the assessment (e.g. Internal Verifiers signing off their own assessments; someone assessing the work of a family member; or someone whose pay is influenced by positive assessment results).</p>	<p>PMI will issue guidance to centres on how to manage and prevent conflicts of interest from occurring in assessment undertaken at the centre and which will state that centres are not permitted to offer financial reward for any of its staff involved in the assessment of learners in respect of the assessment outcomes of those learners (other than normal pay associated with the role of assessors, etc) that may lead to doubts about the integrity of their decisions. Such a practice, where it is found or suspected, may be treated as malpractice and dealt with through PMI 's Malpractice and Maladministration Policy.</p>		



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	<p>In addition, EVs will check this aspect when reviewing assessment arrangements at centres and will record details of any such checks/conflicts recorded in the associated centre engagement reports.</p> <p>If such conflicts cannot be avoided (e.g. due to a lack of competent staff at the centre) the EV will make arrangements for the relevant part of the assessment to be subject to scrutiny by another person and in doing so will seek approval for such arrangements with the Responsible Officer</p>		
<p>Ensuring that all contracted staff (e.g. unit writers, sales staff, part-time monitoring staff, consultants and suppliers) sign appropriate service agreements/contracts that include relevant clauses that govern confidentiality and ownership of information, and prevents them from</p>	<p>All external parties recruited for specific activities will be required to sign an appropriate service agreement/contract along with a non-disclosure agreement (if not already covered by the service agreement/contract).</p> <p>With the normal process being to invite them to respond to a tender/work specification, shortlisted and interviewed before a final selection is made based on the relevant experience, expertise and track record.</p>		

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trading on the name of PMI or offering services or advice to learners or centres based on information they obtained whilst working at PMI.	<p>They will be asked to declare any conflicts of interest in accordance with their duty of confidentiality and/or any other legal duty.</p> <p>Their work will be monitored by their line manager to ensure they operate effectively and in accordance with the expectations for the role they have been recruited for and to ensure that if they have an external role outside of their PMI activities they do not take any actions that are contrary to interests of PMI in the development, delivery or award of our qualifications. In addition, at regular keep-in-touch meetings there will be a standard agenda item to declare any new potential/actual conflicts of interest that may have occurred in the interim period.</p>		
Ensuring staff do not receive undue gifts or hospitality that may affect their judgment or be considered by others as impacting their judgment.	<p>Hospitality of any kind which might reasonably be seen to compromise an employee's personal judgment or integrity and be viewed as exerting influence to obtain preferential consideration should be refused.</p> <p>Staff must not allow themselves to be put in a position that might be deemed by others to have been influential in making a business decision as a consequence of accepting hospitality.</p>		

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	<p>Offers of one-off gifts should be politely but firmly declined. If they are pressed, the recipient should inform their line manager and the Responsible Officer.</p> <p>Gifts of low intrinsic value such as calendars, diaries, flowers or chocolates need not be regarded as subject to this rule. In cases of doubt, the line manager and/or Responsible Officer should be consulted.</p>		
Arrangements with publishers may cause a conflict of interest	<p>We do not have any agreement in place with publishers to endorse their materials. However, should we ever enter into such an agreement the Director of Lifelong Learning and team will be responsible for ensuring that:</p> <ul style="list-style-type: none"> <li>• We take all reasonable steps to ensure the endorsement process does not have an adverse effect.</li> <li>• We publish the criteria which we used to decide whether or not to endorse a particular resource.</li> <li>• Any endorsement is signalled in the same way for all endorsed products (through for example the use of our logo or specified text expressing the endorsement) –</li> </ul>		

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	<p>including those produced by PMI or any affiliated company.</p> <ul style="list-style-type: none"> <li>• Ensure suitable arrangements are in place with any publishers of endorsed resources to ensure they do not market an endorsed resource in a way which implies that the resource contains privileged examiner/assessment insight or that its use is necessary for the successful completion of an assessment or qualification.</li> </ul> <p>For clarification, an endorsement process is where PMI endorses resources which are designed to support the preparation of actual/potential learners for the assessment of a current/proposed PMI qualification.</p> <p>All engagements with publishers seeking endorsement of their resources are carried out by Responsible Officer to ensure we deal with them in an effective and regulatory compliant manner.</p>		
Staff recruitment or management decisions may be influenced if a member of staff on the recruitment panel was a	PMI maintains a policy on the employment and management of near relatives that members of staff must notify their Line Manager as soon as		

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<p>relative or close relation or of one of the candidates/employees.</p>	<p>possible where recruitment or managerial matters involve a spouse, partner or near relative.</p> <p>The Director of Finance and HR maintains a record of related expressions of conflicts of interest on the register.</p> <p>The Director of Finance and HR will also ensure that the related member of staff is not privy to any part of the recruitment process or any relevant information such as interview questions, tests or other related documents at any stage.</p> <p>If it is identified retrospectively that an adverse effect or conflict of interest has arisen a review will be undertaken to identify whether the related outcome has been impacted negatively and agree a remedial outcome.</p>		
<p>Direct employees of PMI may directly or indirectly be involved or interested in any other trade, business or occupation including</p>	<p>PMI contracts of employment require that staff may not without first obtaining the prior written consent of the Employer accept or hold any office or directly or indirectly be interested in any other trade, business or occupation whilst working for PMI.</p>		

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<p>the development, delivery and award of qualifications while working for PMI which may lead to the improper performance of duties for financial or other gain.</p>	<p>The Director of Finance and HR maintains a record of cases where PMI has given written permission for such an arrangement to exist.</p> <p>Failure by staff to disclose an activity or commitment in keeping with this contractual requirement is regarded as a breach of contract which may result in the implementation of PMI' disciplinary procedures.</p> <p>Should an adverse effect occur as a consequence of staff holding any office or be interested in another trade, whether the interest has been declared or not, would be investigated accordingly to determine whether the related outcome has been impacted negatively and determine a remedial measure.</p> <p>PMI employees are also required to declare if they, or a family member or close contact are taking an PMI qualification. The Responsible Officer maintains a record of such cases and informs senior staff involved in the development, delivery and award of qualifications. Appropriate decisions are taken in relation to the staff's involvement with and access to related areas of work.</p>		

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