



## Conflict of Interest Policy

### 1. Policy Statement

This policy applies to all Immerse Medical Training LTD staff, including those who train, assess and undertake internal quality assurance activities.

This policy sets out guidance on how to identify and manage a conflict of interest and the procedure to follow.

This conflict of interest policy supports Immerse Medical Training LTDs commitment to integrity, and alongside the Anti-Bribery Policy encourages the declaration of conflict of relevant interests, so that they can be appropriately managed.

For the purpose of this policy a conflict of interest is defined as existing for Immerse Medical Training LTD if:

- It's interests in any activity undertaken by it, on its behalf or by a member of staff have the potential to lead it to act contrary to its interests in the development, delivery and assessment of qualifications in accordance with the awarding organisations requirements.
- A person who is connected to the development, delivery or assessment of qualifications at Immerse Medical Training LTD has interests in any other activities which have the potential to lead that person to act contrary to their interests in that development, delivery or assessment and impact on our compliance with the requirements set out by our awarding organisations.
- An informed and reasonable observer would conclude that either of these situations was the case.

For the purpose of this policy an adverse effect is defined as:

An act, omission event, incident or circumstance has an adverse effect if it:

- Gives rise to prejudice or adversely affects learners or potential learners, or;
- Adversely affects the ability of Immerse Medical Training LTD to undertake the development, training or assessing of qualifications in accordance with the awarding organisations requirements, or;
- Adversely affects the standards of qualifications which Immerse Medical Training LTD make available or proposes to make available, or;
- Adversely affects public confidence in Immerse Medical Training LTD qualifications



## Conflict of Interest Policy

### 2. Purpose

This policy outlines Immerse Medical Training LTDs intention to identify and monitor all potential or actual conflicts of interest that may affect the delivery and/or assessment of our qualifications now or in the foreseeable future. It has been designed to support all centre staff to identify potential or actual cases of conflict of interest and how to appropriately manage them.

To reduce the risk of a conflict of interest happening we record possible cases that have been identified to date and any arrangements that are in place to prevent them from occurring.

Immerse Medical Training LTD are required to adhere to the Qualsafe Awards Conflict of Interest Policy and from time to time we may be required to provide them with evidence that we are complying with their requirements in relation to conflict of interest, and to prevent such conflict having an adverse effect on our qualifications.

## Conflict of Interest Policy

### 3. Scope

3.1 This policy applies to:

- All employees working in any role, (whether permanent, fixed-term or temporary);
- Any individual working for but not employed directly by Immerse Medical Training Limited such as consultants, contractors, trainees, seconded staff, homeworkers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, wherever located (collectively referred to as employees in this policy);
- Any person who takes up the services of the company;

## Conflict of Interest Policy

### 4 Roles and Responsibilities

#### 4.1 Responsible Person

The Responsible Person is responsible for ensuring that Immerse Medical Training employees understand what constitutes a potential and/or actual conflict of interest and are aware of how to identify and mitigate conflicts or interest.

- The Responsible Person will manage working arrangements to avoid identified conflicts of interest as much as possible. For example, if an Immerse Medical Training LTD employee is undertaking and two out of three Trainer/Assessors are related to the staff member, then the examination should be assessed by the unrelated Trainer/Assessor. Where the identified conflict of interest is unavoidable, particularly in relation to Learner assessment, the Responsible Person will ensure that independent scrutiny occurs to mitigate the conflict (e.g. an IQA could be present during the assessment process).



# Immerse Medical Training LTD

- Upon receipt of a Conflict of Interest Disclosure Form (Appx 1), the Responsible Person will declare all relevant potential or actual conflicts of interest to the appropriate Awarding Organisation.
- The Responsible person will ensure that an accurate and up to date log of all potential or actual conflicts of interest is maintained, along with action mitigating actions taken, updating these should any change in circumstances occur.
- The Responsible Person will ensure that independent scrutiny takes place if a conflict of interest cannot be avoided. This make take the form of an IQA from another training provider or staff from the awarding organisation itself.
- The Responsible Person will ensure that all actions assigned by the relevant awarding organisation are carried out in an effective and timely manner. Failure to do so may result in sanctions.

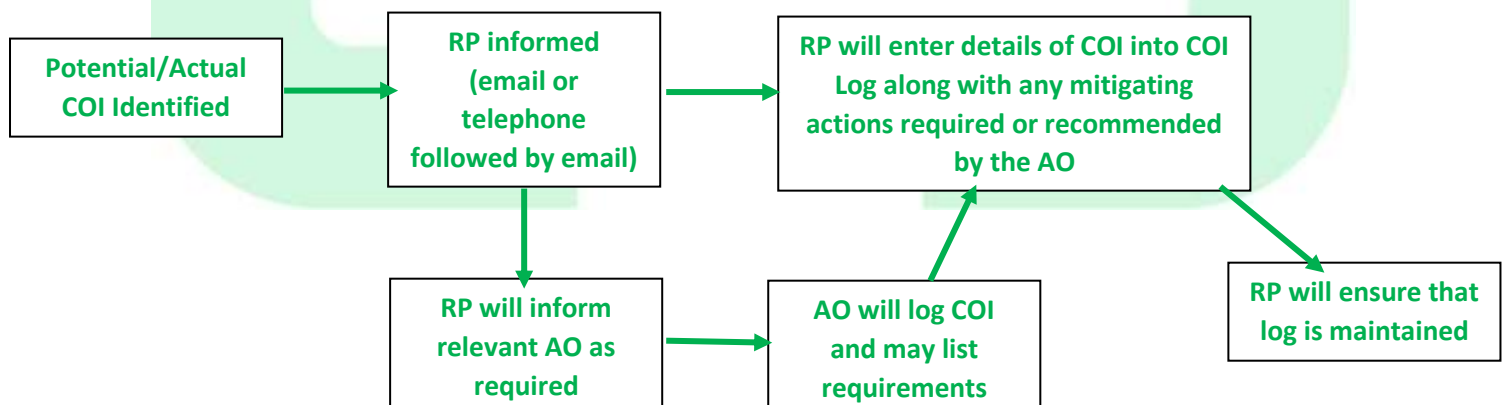
## 4.2 All employees

All Immerse Medical Training LTD employees are required to declare all identified conflicts of interest which will have an impact on centre operation and the delivery of qualifications. In order to do this, a Conflict of Interest Disclosure Form (Appx 1) must be completed and submitted to the Responsible Person. Employees must ensure that submitted forms contain all details of the conflict of interest that has arisen and the actions that have been taken to either avoid or mitigate the conflict.

### Conflict of Interest Policy

#### 5 Policy Implementation - Procedures

The Conflict of Interest Policy must be applied to all activities carried out by Immerse Medical Training LTD or its employees.






<b>Full Name</b>	
<b>Job Title</b>	
<b>Email Address</b>	
<b>Course Name (if applicable)</b>	
<b>Date of Course (if applicable)</b>	
<b>Learner Name (if applicable)</b>	

	I have no conflict of interest to declare
	I have the following conflict of interest to declare

- The type of interest
- The nature of the interest
- A description of all persons involved in the interest, financial or non-financial and/or any other relevant information.

Declaration




I acknowledge that the above interests exist and to the best of my knowledge have informed Immerse Medical Training LTD with all the relevant information relating to the conflict of interest.

<b>Print Name</b>		<b>Signature</b>	
<b>Date</b>			

**Review by Immerse Medical Training LTD Responsible Person (if applicable):**

Action to be taken to minimise Conflict of Interest

<b>AO Notified</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>AO Name</b>	

<b>Print Name</b>		<b>Signature</b>	
<b>Date</b>			



Signed:

Date: 11/11/2022

Review of this version due by: 11/11/2023

## Reviews

Date	Approved – no changes	Approved – with amendments
04/09/18	M. Hyland – Managing Director	N/A
27/09/29	N/A	M. Hyland – Managing Director
23/09/20	M. Hyland – Managing Director	N/A
15/09/21	M. Hyland – Managing Director	N/A
11/11/2022	M. Hyland – Managing Director	