

## **EAST BRIDGE TRAINING (EBT)**

### **CONFLICT OF INTEREST POLICY**

**Policy Reference:** EBT-POL-COI-007

**Version:** 1.0

**Policy Created:** September 2025

**Effective Date:** 09 September 2025

**Review Date:** 09 September 2026

**Approved By:** Director, East Bridge Training (EBT)

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#### **1. Purpose**

The purpose of this Conflict of Interest Policy is to ensure that all decisions, actions, and processes at East Bridge Training (EBT) are conducted with integrity, impartiality, and transparency, free from personal, financial, or institutional conflict.

This policy supports compliance with:

- Executive Council Resolution No. 30 of 2021 (Vocational Education Regulation)
- KHDA Standards **A1.4, A1.7, A4.1(b)**
- KHDA requirements that awarding organisations and training centres remain free from conflict (B1.6(i), B1.7(g))
- Awarding body quality assurance and governance frameworks

EBT maintains a strict zero-tolerance approach toward any form of conflict that may compromise fairness in admissions, teaching, assessment, certification, or quality assurance.

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#### **2. Scope**

This policy applies to:

##### **Staff**

- Director
- Shareholders
- Trainers
- Assessors

- Internal Verifiers
- Administrative and admissions staff
- Quality assurance personnel
- Contractors and consultants

## **Learners**

Any learner who may have a relationship influencing assessment or administrative decisions.

## **External Stakeholders**

Awarding body representatives, industry partners, and placement organisations involved in assessment or decision-making.

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## **3. Policy Statement**

EBT is committed to:

- Preventing all conflicts of interest (personal, financial, academic, or organisational)
- Ensuring decisions are objective, fair, and evidence-based
- Maintaining strict boundaries between business operations and assessment decisions
- Ensuring no preferential treatment for learners or staff
- Protecting the credibility and integrity of vocational qualifications
- Ensuring all staff declare conflicts annually and as they arise
- Complying fully with KHDA governance requirements

No staff member may use their role to influence admissions, assessment, progression, or certification outcomes.

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## **4. Definitions**

### **4.1 Conflict of Interest**

Any situation where personal, professional, financial, or family interests could influence — or appear to influence — objective decision-making at EBT.

#### **4.2 Personal Conflict**

Relationships (family, friends, partners) that may bias judgement.

#### **4.3 Financial Conflict**

Any financial interest, gift, incentive, or payment that could influence a decision.

#### **4.4 Institutional Conflict**

When EBT's involvement with external entities may compromise its impartiality.

#### **4.5 Academic Conflict**

Situations where staff may be biased in assessment, admission, or learner support decisions.

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### **5. Common Examples of Conflicts of Interest**

Conflicts include, but are not limited to:

- Assessors marking work of relatives or close associates
- Trainers providing paid private tutoring to enrolled learners
- Staff participating in admissions decisions where personal relationships exist
- Staff receiving gifts or benefits from learners
- External assessors with financial ties to learners
- Staff holding an ownership stake in a vendor supplying services to EBT
- Staff recommending training services where they receive commissions
- Any relationship that compromises independence in decision-making

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### **6. Mandatory Disclosure Requirements**

#### **6.1 Staff Disclosure**

All staff must:

- Submit a **Conflict of Interest Declaration Form** on appointment
- Update the declaration annually

- Immediately disclose any new or emerging conflicts

## **6.2 Learner Disclosure**

Learners must disclose:

- Relationships with staff
- Any external assessor or trainer with whom they have personal ties
- Any situation that could compromise assessment fairness

## **6.3 Manager Responsibilities**

Line managers must:

- Review declarations
- Document and manage conflicts
- Escalate serious cases to the Director

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## **7. Restrictions & Prohibited Activities**

To comply with KHDA Standards A1.7 and A4.1(b), EBT strictly prohibits:

- Staff influencing admissions, assessment, or certification for relatives or associates
- Staff assessing or verifying work of individuals with personal connections
- Trainers offering paid tutoring or private lessons to current learners
- Staff accepting gifts, incentives, or favours from learners
- Staff engaging in external employment that conflicts with EBT duties
- Staff promoting external programmes not authorised by EBT or KHDA
- Awarding body representatives assessing learners they have trained privately

If any prohibited activity occurs, immediate disciplinary action will be taken.

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## **8. Managing Conflicts of Interest**

Where a conflict is identified, EBT will:

1. **Record** the conflict in the Conflict Register

2. **Assess** the severity
3. **Decide** mitigation steps
4. **Remove** the conflicted individual from the process
5. **Appoint** an unbiased staff member to manage the activity
6. **Notify** KHDA or awarding bodies where required

Mitigation may include:

- Reassigning assessors
- Changing verifier allocations
- Reallocating admissions tasks
- Preventing conflicted personnel from decision-making

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## **9. Confidentiality & Data Protection**

All disclosures are handled in accordance with:

- KHDA Standard A2.10
- EBT Data Protection Policy

Information is stored securely and shared only with authorised individuals.

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## **10. Monitoring & Compliance**

To comply with KHDA Standards A4 and B4:

- The Quality Nominee conducts periodic reviews
- Conflict registers are audited annually
- Internal Verification checks ensure no conflict in assessment allocation
- Any breach is investigated under the Staff Malpractice & Maladministration Policy

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## **11. Non-Compliance & Consequences**

Failure to declare or manage a conflict may lead to:

## **For Staff**

- Formal warning
- Removal from assessment duties
- HR disciplinary action
- Suspension or dismissal
- Reporting to KHDA

## **For Learners**

- Reassessment
- Disqualification
- Disciplinary action for attempted influence

Deliberate concealment is considered misconduct.

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## **12. Appeals**

Staff or learners may appeal conflict-related decisions under the **EBT Appeals & Grievances/Complaints Policy** within **5 working days**.

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## **13. Roles & Responsibilities**

### **Director**

Final authority for conflict decisions; ensures KHDA compliance.

### **Academic Head**

Monitors academic conflicts and reassigns duties.

### **Quality Nominee**

Maintains conflict register; verifies removal of conflicts in QA processes.

### **Assessors & Trainers**

Declare conflicts immediately and avoid related assessment decisions.

### **Administrative Staff**

Ensure conflict-free admissions and learner support processes.

#### **Learners**

Declare any relationships that may impact assessment fairness.

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#### **14. Policy Review**

This policy is reviewed annually in accordance with KHDA institutional requirements.

Next review due: **09 September 2026**

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#### **Approval**

**Name:** Shivanjan Chakraborty

**Title:** Director, East Bridge Training



**Signature:** \_\_\_\_\_

**Date:** 09 September 2025