

Conflict of interest policy

This policy outlines the principles and procedures for managing conflicts of interest within DHA.

All DHA employees must be free from conflicts of interest that could adversely affect their judgement or objectivity to the organisation in conducting business activities.

DHA recognises that employees may take part in legitimate financial, business, charitable and other activities outside of their employment by DHA but any potential conflict of interest raised by those activities must be acknowledged, disclosed, and managed.

It is the responsibility of employees to recognise situations in which they have a conflict of interest or might be seen by others to have a conflict to disclose this conflict and to take such further steps as may be appropriate and set out in more detail under the procedure below.

Following termination of employment employees shall not solicit or seek business from any customers of DHA or who were customers in the 5 years prior to termination of employment.

A conflict of interest may be defined as a conflict between the official responsibilities of an employee and any other interests the individual may have and as such could compromise or appear to compromise their decisions.

Examples of Conflicts of Interests that could lead to actual or perceived conflicts of interest. This list is not exhaustive.

- Employees working with a business outside DHA that is in an existing customer or in direct competition with DHA
- Employees participating in the appointment, promotion, management, or evaluation of a person with whom the person, has close or familiar ties
- Trainers having a close or familiar relationship with a registered learner or learners' family whilst being involved in decisions about the outcome of their qualification
- Employees using non-public DHA information or DHA learner data for personal gain or advantage

The existence of such interests as those outlined above, does not necessarily imply conflict, but is likely to give an appearance of conflict and as such should be declared.

It is the duty of all employees to disclose any actual or potential conflict of interest, and the process for doing this is documented below:

All employees must disclose potential conflicts of interest to their line manager.

Breach of this will be a breach of their contract of employment with DHA.

The information submitted will then be evaluated to identify if any further action is required and a written record of the outcome of the evaluation is kept.

Some situations may require no further action. However, if a conflict of interest interferes with the operation of DHA business it will need to be managed appropriately.

Examples of actions that could be taken:

- Individual not taking part in discussions or decisions of certain matters
- Referring certain matters for decision to others with no personal stake
- Agreeing not to be involved in a particular employer or with a particular learner
- Disciplinary action that could lead to dismissal