

CONFLICT OF INTRESET POLICY

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RED DUNE

Conflict of Interest Policy

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RED DUNE TRAINING CENTRE

1. Purpose & Scope

The purpose of this Conflict of Interest (COI) Policy is to protect the integrity, impartiality, and credibility of Red Dune Training Centre (Saudi Arabia) by ensuring that decisions affecting teaching, assessment, certification, procurement, recruitment, and learner services are based solely on merit and evidence. Conflicts—whether actual, potential, or perceived—can undermine trust, distort judgement, and create unfair advantage. This policy sets out how such conflicts are identified, declared, recorded, assessed, and managed so that all centre activities remain fair, transparent, and defensible. It supports the centre's quality management system and our commitment to safe, ethical, and environmentally responsible operations.

Scope

This policy applies to every person and function connected to Red Dune Training Centre, regardless of contract type or seniority, including:

- **All staff** (permanent, temporary, part-time), **managers**, and **governance roles**.
- **Contractors, consultants, agency personnel, visiting tutors, guest speakers, and external examiners/assessors**.
- **Quality roles** including IQA personnel and anyone interacting with external quality assurance (EQA) or external verification.
- **Administrative and support teams** handling admissions, scheduling, document control, data, finance, and certification.
- **Suppliers and service providers**, especially those involved in training materials, venues, equipment, and invigilation services.
- **Learners and clients**, where their relationships or interests may intersect with assessment, placement, sponsorship, or purchasing decisions.

This policy covers conflicts arising in (but not limited to): assessment design and marking; reasonable adjustments or special considerations; invigilation and results approval; standardisation and internal verification; handling of complaints and appeals; centre audits and external reviews; recruitment, promotion, and allocation of classes; procurement of goods and services; acceptance of gifts, hospitality, sponsorships, or endorsements; outside employment, consultancy, or board memberships; family, personal, or financial relationships; and use of confidential or insider information.

The policy applies to all delivery modes (classroom, blended, e-learning), all sites and partner locations, and all programmes we offer, including international qualifications and TVTC-regulated courses. Where partner or awarding-body requirements impose a stricter standard, the stricter rule prevails. Non-compliance may lead to recusal, reassignment, corrective action, or disciplinary measures, and—where required—notification to relevant external authorities.

2. Definitions

Conflict of Interest (COI)

Any situation in which personal, financial, or relational interests could improperly influence—or be seen to influence—the impartiality, integrity, or objectivity of decisions or actions taken for Red Dune Training Centre. COI includes three states:

- **Actual:** A conflict is present now (e.g., assessor marking a relative's script).
- **Potential:** A conflict may arise in the future due to known circumstances (e.g., planned consultancy with a supplier).
- **Perceived (Apparent):** A reasonable person could believe a conflict exists, even if no improper act occurred (e.g., social ties with a candidate under assessment).

Related Party

Any individual or entity with a close connection to a staff member, contractor, or governing person that could benefit from or influence Centre decisions. This includes immediate family, close personal relationships, business partners, beneficial ownerships, and entities where the person serves as director, officer, trustee, or shareholder.

Gifts and Hospitality

Any benefit, favor, Special discount, service, ticket, travel, accommodation, meal, or tangible item offered or received in connection with Centre work. Low-value, customary courtesies may be acceptable if recorded; cash or cash-equivalents are prohibited. Gifts/hospitality must never create an obligation or alter assessment, procurement, or compliance decisions.

Secondary Employment (Outside Interests)

Any paid or unpaid role, consultancy, teaching, board membership, or business activity undertaken in addition to centre duties. Such activity must be declared in advance and must not compete with, bias, or interfere with centre responsibilities, including assessment, invigilation, quality assurance, or procurement.

Close Personal Relationships

Relationships that could reasonably affect neutrality, including family (by blood, marriage, or guardianship), intimate partners, cohabitantes, and relationships of strong friendship or dependency (e.g., mentor–mentee). Staff must not assess, invigilate, or decide on matters affecting these individuals.

Financial Interests

Any direct or indirect monetary stake that could benefit from a decision (shares, options, loans, commissions, bonuses, contingent fees, or procurement incentives).

Non-Financial Interests

Influences not tied to money but still capable of biasing decisions (professional prestige, academic outcomes, political/association ties, reputational gain, research authorship, or personal favors).

Note: Undeclared perceived conflicts can be as damaging as actual conflicts; all three states require disclosure and appropriate mitigation.

3. Policy Statement & Principles

Red Dune Training Centre (Saudi Arabia) is committed to safeguarding the integrity of all decisions relating to training, assessment, certification, procurement, and staffing. We operate with zero tolerance for undisclosed or unmanaged conflicts of interest. Everyone—employees, contractors, visiting tutors, assessors, invigilators, suppliers, and governors—must act in the best interests of learners, clients, awarding bodies, and TVTC expectations, consistent with ISO 9001, ISO 14001, and ISO 45001.

Impartiality. Decisions about learner admission, reasonable adjustments, assessment design, marking, IQA sampling, results approval, appeals, complaints, hiring, and purchasing must be free from bias, favoritism, or personal gain. Where a personal connection or interest exists, it must be declared immediately and the individual recused or controls applied.

Transparency. All relevant interests (financial and non-financial) must be proactively disclosed at induction, reviewed annually, and updated whenever circumstances change. Disclosures are recorded in the Centre COI Register, alongside mitigation measures, with access restricted to authorised personnel.

Fairness. Learners must receive equal treatment and equal opportunity to demonstrate competence. We prohibit private coaching of enrolled learners for personal benefit, accepting gifts beyond approved thresholds, or using confidential or assessment information for advantage. Where a risk to fairness is identified, we will redesign tasks, add second marking, or appoint an independent reviewer.

Zero tolerance for undisclosed conflicts. Failure to declare, deliberate concealment, or influencing outcomes while conflicted may lead to removal from duties, invalidation of results, disciplinary action, notification to awarding bodies/TVTC, and, where applicable, legal redress.

Continuous improvement. We review COI disclosures, audit samples, and external feedback through our PDCA cycle to strengthen controls, train staff, and prevent recurrence. We recognize environmental and OH&S dimensions, avoiding pressures that compromise safe invigilation or ethical, sustainable procurement and lawful conduct. This statement applies to all activities, sites, and delivery modes operated by Red Dune Training Centre.

4. Confidential Information & Insider Knowledge

Policy Intent

To protect Red Dune Training Centre's confidential information and any awarding-body or TVTC material entrusted to us, and to prevent real, potential, or perceived conflicts of interest arising from misuse of insider knowledge. This supports ISO management systems.

Scope

Applies to all employees, contractors, visiting tutors, assessors, invigilators, externals under NDA, and learners who are given privileged access to information, systems, or premises.

What counts as confidential

Unreleased exam papers/items, marking schemes, candidate scripts, results, login credentials, proctoring settings, IQA sampling plans, audit reports, commercial contracts, procurement data, personal data, incident records, and any guidance marked "restricted," "confidential," or similar by awarding bodies or TVTC.

Core rules

1. Confidential information may not be copied, shared, or used for personal gain, competitive advantage, tutoring side-work, or social media content.
2. Only approved staff may access exam materials, on a need-to-know basis, within secure systems/rooms.
3. Draft or live assessment content must never be used in teaching examples or mock tests unless expressly authorised and reclassified.
4. No private coaching of currently enrolled learners using insider knowledge.
5. Gifts, inducements, or requests for early access to materials must be refused and reported.

Controls

Unique user accounts, strong authentication, clean-desk and clear-screen rules, sealed storage, chain-of-custody logs, version control, encryption for transmission, and immediate revocation of access on role change or exit. BYOD use requires prior approval and device compliance.

Reporting & breaches

Suspected loss, leakage, or tampering must be reported at once to the Quality Lead and Head of Centre. We will isolate systems, notify relevant authorities/awarding bodies, investigate root causes, and implement corrective and preventive actions.

5. Review, Approval & Mitigation Plans

All conflict-of-interest (COI) disclosures are submitted to the Quality Lead (QL) using the centre's COI Declaration Form. The QL screens each disclosure for completeness, requests clarifications if needed, and assigns a risk rating (Low/Medium/High) based on the likelihood and impact on impartiality, assessment integrity, learner experience, and legal/regulatory compliance.

The QL proposes proportionate mitigations and submits a recommendation to the Head of Centre (HoC) for approval. The HoC is the final decision-maker for High-risk cases; Medium/Low cases may be approved by the Centre Manager under delegation from the HoC. Mitigation actions may include one or more of the following:

- Reassignment of duties (e.g., assessor, invigilator, moderator, procurement role).
- Second marking, blind double-marking, or independent IQA sampling.
- External oversight (e.g., external subject specialist or awarding-body guidance).
- Recusal from meetings/decisions; segregation of duties and additional witnesses.
- Time-bound conditions (e.g., no private coaching of enrolled learners).
- Enhanced evidence trails (checklists, signoffs, audit trails).
- For gifts/hospitality: refusal, return, or recorded acceptance within threshold.

Every decision is recorded in the COI Register with the case ID, persons involved, risk rating, controls applied, approving authority, start/end dates, and review date. The QL monitors implementation and verifies effectiveness; if controls prove insufficient, the case is escalated to the HoC for further action, which may include redesign of assessment arrangements or external review. Individuals retain the right to request reconsideration if new evidence emerges.

Confidentiality is maintained throughout; data is handled under our document-control and data-protection procedures. Patterns and systemic risks from COI cases feed into internal audit, staff CPD, standardization activities, and the Quality Review Meeting to drive continuous improvement. Non-compliance with approved mitigations may trigger disciplinary action.

6. Monitoring, Internal Audit & Reporting

Red Dune Training Centre will monitor conflicts of interest (COI) through routine IQA/Quality checks, risk-based sampling, and scheduled internal audits to ensure impartial assessment and compliant operations aligned with international awarding bodies and TVTC expectations and ISO 9001/14001/45001 based.

Routine checks (IQA/Quality):

- Pre-assessment: confirm all assessors/invigilators have current COI declarations; verify no declared links with learners on allocated groups; replace staff where needed.
- In-delivery: spot-checks on classes, invigilation, and marking to confirm recusal and segregation of duties; review Gifts & Hospitality Register.
- Post-assessment: second-marking samples where a COI risk exists; verify that any declared COIs were mitigated and recorded.

Internal audits:

Quarterly audits sample COI Registers, assessor allocation logs, standardization minutes, appeals/complaints files, and procurement records. Findings are graded (minor/major/critical), assigned owners and due dates, and tracked to closure with effectiveness checks.

Reporting:

A monthly Quality Dashboard goes to the Centre Manager and Head of Centre; a termly summary is tabled at the Quality Review Meeting (QRM) with trends, root-cause analysis, and CAPA. Material or systemic COI issues are escalated immediately to the Head of Centre and, where required, notified to the awarding body/TVTC. Whistleblowing routes remain open with non-retaliation.

Records & control:

All checks, audits, dashboards, and CAPA are controlled documents. Evidence and registers are retained per our Document Control and Records Retention procedures and feed into management review and continuous improvement.

7. Secondary Employment & Outside Interests

Red Dune Training Centre recognizes that staff may undertake external work (paid or unpaid), teach elsewhere, provide consultancy, or hold board/committee memberships. These activities must not compromise impartial assessment, learner fairness, exam security, data privacy, safety, environmental stewardship, or availability for Centre duties (aligned with TVTC International bodies expectations and ISO 9001/14001/45001 principles).

What must be disclosed

Any outside role that could reasonably create an actual, potential, or perceived conflict—e.g., tutoring enrolled learners privately, assessing at a competitor centre, consultancy to a supplier/contractor, ownership interests in vendors, or governance roles (board, advisory, committee). Social-media endorsements, sponsorships, or referral arrangements must also be declared.

When and how to disclose

- On induction, annually, and ad hoc within 72 working hours of any change.
- Submit the COI Disclosure Form to the Centre Manager and Quality Lead (copy: complaints@reddune.org).
- Include nature of work, counterparties, time commitment, remuneration/benefits, overlap with Red Dune duties, and proposed safeguards.

Approval process

The Head of Centre, advised by the Quality Lead, will risk-rate the declaration and decide to: (a) approve, (b) approve with conditions, or (c) decline. Decisions and mitigations (e.g., recusal from marking/invigilation, second marking, segregation of duties, restricted system access, exam-item firewalls) are recorded in the COI Register.

General rules

- External work must not use Centre time, facilities, logos, confidential information, or assessment materials.
- No private coaching of current learners for a fee.
- Competitor employment that involves access to assessments or certification decisions is prohibited.
- Board/consultancy roles require clear boundaries and documented recusals.

8. Governance & Review

Policy owner. The **Head of Centre (HoC)** is the accountable owner of the Conflict of Interest (COI) Policy for Red Dune Training Centre (Saudi Arabia). The HoC ensures the policy's suitability, adequacy, and effectiveness, supported by the **Quality Lead/IQA** for day-to-day control, registers, monitoring, and reporting. Functional support is provided by the **Centre Manager** (implementation), **HSE Officer** (neutrality in OH&S decisions), and **HR/Admin** (induction and annual declarations).

Review frequency. This policy is reviewed **at least annually** and **whenever triggers occur**, including:

- TVTC, awarding-body, or Saudi legal/regulatory changes.
- Findings from internal audits, external audits, or investigations.
- Significant organizational change (new programmes, new sites, acquisitions);
- Incident trends (malpractice, appeals outcomes, gifts/hospitality anomalies);
- Stakeholder feedback indicating perceived or actual conflicts.

Approval route.

1. Draft and evidence pack prepared by the Quality Lead (risk assessment, register trends, audit findings).
2. Technical check by the Centre Manager and HSE Officer (operational practicality; OH&S neutrality).
3. **Quality Review Meeting (QRM)** endorsement.
4. **Head of Centre** formal approval and issue.
5. Communication to all staff/contractors; induction and refresher briefings scheduled; updated forms/registers released.

Change control & versioning. Every update is managed as a **controlled document** under ISO 9001 principles:

- Unique document code, version number, issue date, next review date, owner, approver.
- **Change-log** records what changed, why (trigger), impacted processes, and actions required (training, form withdrawal, system updates).
- Obsolete versions are withdrawn from circulation and archived with "Superseded" status.

Monitoring & assurance. Compliance is evidenced through: COI Declarations, Gifts & Hospitality Register, Assessment COI Logs, recusal records, and internal audit reports. KPIs (e.g., declaration completion rate, time-to-mitigate, repeat issues) are reviewed termly at the QRM. Material risks or unresolved conflicts are escalated to the HoC and, where required, reported to awarding bodies/TVTC.