



DISCLOSURE POLICY FOR CONFLICTS OF INTEREST

Sensory Beginnings Limited recognises the need to have arrangements in place that prevent, counter and deal with potential conflicts of interest.

Sensory Beginnings Limited has no reason to believe that conflicts of interest undermine decision-making but we must be vigilant about the risk and have appropriate policies and plans in place. We must be able to withstand internal and external scrutiny.

Definitions:

Sensory Beginnings Limited defines conflicts of interest as a set of circumstances that create a risk that an individual's ability to apply judgement or act in one role is, or could be, impaired or influenced by a secondary interest.

Even a perception of competing interests, impaired judgement or undue influence may be damaging to Sensory Beginnings Limited reputation.

Generally conflicts might occur if individuals creating and/or delivering the course material have, for example:

- A direct or indirect financial interest
- Non-financial or personal interests
- Competing loyalties between an organisation they owe a primary duty to and/or some other person or entity

Examples of Conflict of Interest:

Financial interests

This is where an individual receives or may receive a direct financial benefit from the consequences of the awarding of funding, for example:

- a director, including a non-executive director, or senior employee in an organisation which is doing, or which is likely, in receipt of funding or possibly seeking to obtain funding



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- a shareholder (or similar ownership interests), a partner or owner of a private or not-for-profit company which is doing, or which is likely, or possibly seeking to obtain funding
- a shareholder of a business or start up, that Sensory Babies has shares
- a management consultant for a business/individual
- in receipt of secondary income from a business/individual
- in receipt of any payments (for example honoraria, one-off payments, day allowances or travel or subsistence) from an organisation possibly seeking to obtain funding.

Indirect financial interests

This is where an individual has a close association with an individual who has a financial interest, a non-financial professional interest or a non-financial personal interest in a commissioning decision (as those categories are described above) for example:

- spouse / partner
- close relative (for example, parent, grandparent, child, grandchild or sibling)
- close friend
- business partner
- a financial relationship (for example, a pension) with a business/individual seeking to obtain funding.

Non-financial professional interest

This is where an individual may obtain a non-financial professional benefit from the consequences of a funding award, such as increasing their professional reputation or status or promoting their professional career. This may, for example, include situations where the individual is:

- an advocate for a particular group or
- a member of a particular specialist professional body.

Non-financial personal interests



This is where an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit. This could include, for example, where the individual is:

- a voluntary sector champion for business/individual
- a volunteer for business/individual or
- a member of a lobby or pressure group with an interest in research or development.

Indirect interests

This is where an individual has a close association with an individual who has a financial interest, a non-financial professional interest or a non-financial personal interest in a commissioning decision (as those categories are described above), for example, a:

- spouse / partner
- close relative (for example, a parent, grandparent, child, grandchild or sibling)
- close friend
- business partner

Declaring Conflicts of Interest:

Sensory Beginnings Limited is committed to being 100% transparent to past, present and future learners of any financial and non-financial interests. They will avoid selective disclosures.

Sensory Beginnings Limited has procedures in place whereby employees and contractors are required to disclose any financial or non-financial interests immediately.

Sensory Beginnings also reviews any conflicts of interests on a quarterly basis of all employees and contractors and declares any current financial and non-financial disclosures in a disclosure statement on the business website, terms & conditions and at the beginning of each course. This includes all Online and Face-to-Face Courses.