NAJ Resolve

Conflict of Interest Policy

Version: 1.0
Date Issued: June 2025
Next Review Due: June 2026
Owner: Compliance and Policy Manager, NAJ

1. Purpose

This policy ensures that all ADR (Alternative Dispute Resolution) officials act with integrity, impartiality, and independence, and that any actual or perceived conflicts of interest are identified, disclosed, and appropriately managed.

2. Scope

This policy applies to all ADR officials, staff, contractors, and any individuals involved in the dispute resolution process.

3. Definition of Conflict of Interest

A conflict of interest arises when an ADR official's personal, financial, or professional interests could compromise, or appear to compromise, their impartiality in handling a dispute.

4. Disclosure Requirements

All ADR officials must disclose any actual, potential, or perceived conflicts of interest before accepting a case. Disclosure must be made promptly and in writing to the ADR Manager and recorded in the Conflict of Interest Log. This is a continuing obligation throughout the dispute resolution process. Where there is uncertainty about whether a conflict exists, the ADR official must err on the side of caution and make a disclosure to the ADR Manager for review.

5. Single ADR Official and Conflict of Interest

The ADR function is currently carried out by a single ADR official, the Compliance and Policy Manager at NAJ. To maintain impartiality, the ADR official operates independently from the NAJ's membership, marketing, and commercial teams.
In the event of a declared conflict of interest:
- The case will be referred to CEDR (Centre for Effective Dispute Resolution), a certified ADR body of which NAJ is a member.
- Both parties will be informed of the conflict and the referral.

The NAJ is a division of the British Allied Trades Federation (BATF) which is a company limited by guarantee and registered in England & Wales number 69391

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- If referral is not possible, both parties will be notified and given the opportunity to object to the ADR official continuing with the case. The case will only proceed if no party objects.

6. Remuneration and Independence

The ADR official is employed by the National Association of Jewellers (NAJ) and remunerated through the British Allied Trades Federation (BATF). To ensure independence:
- The ADR official's remuneration is not linked to the outcome of any dispute.
- No bonuses or incentives are awarded based on case results.
- The ADR official does not report to any party with a vested interest in the dispute.

8. Record Keeping

A Conflict of Interest Log will be maintained and reviewed annually. The log will be held securely and made available to the CTSI or other regulators upon request. The log will include:
- Name of ADR official
- Date of disclosure
- Nature of the conflict
- Actions taken
- Outcome (e.g., reassignment, party consent)

9. Training and Awareness

All ADR officials will receive training on this policy and the importance of maintaining impartiality.

10. Review

This policy will be reviewed annually or in response to regulatory changes or incidents.

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