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**Conflicts of Interest Policy**

**Policy Adopted September 2020**

**Introduction**

The document outlines both our:

* broad approach to identifying and monitoring all actual/potential conflicts of interest that may affect Crossfields Institute both now and in the foreseeable future; and
* the possible conflicts of interest that have been identified to date and the arrangements in place to prevent these from occurring.

It may from time to time be provided to the regulators upon request to satisfy them of our ability to comply with their requirements in relation to conflicts of interest and to prevent such conflict becoming ‘Adverse Effects’ (as defined by the regulators).

**Definition of a Conflict of Interest**

For the purposes of this policy we have adopted the definition used by the regulatory authorities in relation to conflict of interests. In essence a conflict of interest exists in relation to Crossfields Institute where:

* its interests in any activity undertaken by it, on its behalf, or by a member of its staff have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications in accordance with the requirements of the regulator’s Conditions of Recognition,
* a person who is connected to the development, delivery or award of qualifications at Crossfields Institute has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in the development, delivery or award of qualifications and impact on our compliance with the requirements of the regulator’s Conditions of Recognition,
* an informed and reasonable observer would conclude that either of these situations was the case.

**Overview**

As an organisation that keeps all aspects of its business under review, individual teams are expected to identify and inform the Responsible Officer of any actual/potential conflicts of interest that could impact Crossfields Institute and which are not already identified in the table at the end of this policy.

In addition, team leaders are required to manage and monitor any identified conflicts of interest that relate to their area of operations (as outlined in the table at the end of this document). Should the status of any identified conflict, or the associated controls change, then the team leader should inform the Responsible Officer so they can update, as required, the details in the table below.

Overall our compliance with regard to identifying and managing any conflicts of interest will be reviewed regularly by the CEO, the Quality Committee and the Board of Trustees.

**Conflict of Interest Principles**

In implementing our approach to identifying and managing actual/potential conflicts of interest staff are required to abide by the following principles:

* All staff must commit to identifying and managing all actual/potential conflicts of interest that may affect Crossfields Institute and in doing so raise possible conflicts of interest with the Responsible Officer if in doubt
* Staff must be proactive in the identification and management of conflicts of interest that may affect our effectiveness, level of regulatory compliance and/or reputation.
* Staff must be open about the nature of any potential/actual conflicts of interest and not try to hide or present them in a better light – managing conflicts of interest is about preventing issues from occurring that may impact on our operational effectiveness and/or regulatory compliance
* Strive to identify and deal with conflicts of interest sooner rather than later
* Our controls for managing any potential conflicts of interest must be proportionate to the risks associated with the identified conflict(s)

**Dealing with Conflicts of Interests and/or Breaches to the Procedures**

Should any member of staff, a Trustee or Quality Committee member believe there has been a breach of this policy, or unforeseen conflicts of interest emerge, the Responsible Officer must be informed and an investigation carried out immediately along with a review of the associated procedures.

Should an external party feel there has been an actual conflict of interest involving Crossfields Institute then they should raise the matter with the Responsible Officer who will begin an investigation, (unless they have an involvement/interest in the allegation, in which case it will be passed to another senior member of staff (or, if required, an external party will be appointed to carry out the review). The outcome will be reported to the Board of Trustees. At all times we will ensure that personnel assigned to the investigation have the appropriate level of training and competence and they have had no previous involvement or personal interest in the matter.

If the breach is also classified as an Adverse Effect then the Responsible Officer must promptly inform Ofqual in accordance with our procedure for dealing with Adverse Effects (see Governance Manual for further details). In so doing, she will inform Ofqual of the reasonable steps that we have taken or intend to take to prevent, correct or mitigate the Adverse Effect, including details of any reviews we are/will carry out. For information, the Ofqual definition of an Adverse Effect is:

*An act, omission, event, incident, or circumstance has an Adverse Effect if it –*

*(A) gives rise to prejudice to Learners or potential Learners, or*

*(B) adversely affects –*

*(i) the ability of the awarding organisation to undertake the development, delivery or award of qualifications in accordance with its Conditions of Recognition,*

*(ii) the standards of qualifications which the awarding organisation makes available or proposes to make available, or*

*(iii) public confidence in qualifications.*

**Contact**

If you have any queries about the contents of the policy, please contact the Responsible Officer on 01453 808118 or via email info@crossfieldsinstitute.com

**Review arrangements**

We will review this document annually as part of our self-evaluation arrangements. However, a review will be commissioned earlier should an issue arise in relation to an actual or potential conflict of interest and/or in response to customer, learner or regulatory feedback.

**Policy Last Reviewed September 2020**

**Next revision date September 2021**

Reviewed by: Responsible Officer, Lou Doliczny

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**Appendix 1 – Declaration of Interest Form**

Each member of our staff, including members of the Board of Trustees and members of the Quality Committee must complete the following form to help ensure Crossfields Institute actively identifies and manages any potential conflicts of interest. This must be signed on appointment and at each performance development review (PDR).

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Name** | | **Title/role** | | |
|  | |  | | |
| **Details of any external interests that may lead to a possible conflict of interest occurring.** | | | | |
|  | | | | |
| **Signed** |  | | **Date** |  |

**THIS_LOGOAppendix 2 – Register of Interests**

This Register of Interests is now recorded in the Mercury system, Governance section, the information below is recorded. Any conflicts are reported to the Board and Quality Committee.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Name** | | **Conflict title** | **Conflict details** | **Date registered** | **Conflict controls**  **(eg how is the potential/actual conflict being mitigated or prevented)** | **Additional Notes** |
| 1 |  |  |  |  |  |  |
| 2 |  |  |  |  |  |  |
| 3 |  |  |  |  |  |  |