

## Conflict of Interest Policy



**European Union**  
European  
Social Fund



Conflict of Interest Policy September 2021-2022	
<b>AIM:</b>	To provide clear direction to staff and others about complaints and how to make and deal with them.
<b>NAMED STAFF/PERSONNEL WITH SPECIFIC RESPONSIBILITY FOR SAFEGUARDING</b>	<ul style="list-style-type: none"><li>• <b>Lead</b> – Anita McGreevy</li><li>• <b>Deputies</b> – Lauren Breakell</li><li>• <b>Nominated Trustee</b> – Holly Clare</li></ul>
<b>DISTRIBUTION:</b>	<ul style="list-style-type: none"><li>• CWP staff, volunteers and learners</li><li>• Service users</li><li>• Website</li></ul>
<b>DATE FOR IMPLEMENTATION:</b>	1 <sup>st</sup> September 2021
<b>DATE OF NEXT REVIEW:</b>	31 <sup>st</sup> August 2022
<b>AUTHOR:</b>	Anita McGreevy – Compliance & Operations Manager
<b>APPROVED BY:</b>	Bill Adams – Chair of Trustees

## Conflict of Interest Policy

### Statement of Intent

CWP is committed to providing high quality service to its service users: volunteers, trainees, projects, project users and funders.

This Conflict-of-Interest policy enables us to identify, manage and mitigate conflicts of interest. All staff and other individuals have a responsibility to be aware of the potential for a conflict of interest.

The purpose of this policy is to protect our integrity as a business and the integrity of our qualifications. The policy is also designed to protect our staff by providing guidance on handling possible conflicts of interest that may arise as a result of the organisations role in delivering courses.

This policy:

- defines what is meant by conflict of interest
- describes the role of conflict of interest in the context of working with, or for, an awarding organisation
- sets out the responsibilities for managing conflict of interest at each level in the organisation

### Scope of policy

This policy applies to all staff and other individuals who interact or potentially interact with the work of the awarding organisation. This includes individuals involved with any aspects of the creation, marketing, sales, distribution, marking or any other activity connected with qualifications, tests and assessments, and supporting resources and services.

The individuals falling within the scope of this policy include all staff employed by CWP on a full time, part time or casual basis.

### Definition of Conflict of Interest

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

Conflicts of interest can arise in a variety of circumstances for example:

- When an individual has a position of authority in one organisation that conflicts with their interests in another organisation.
- When an individual has interests that conflict with their professional position. Where someone works for or carries out work on the schools behalf but may have personal interests – paid or unpaid – in another business.
- Where someone works for or carries out work on CWP behalf, who has friends or relatives taking assessments or examinations.

### Principles

CWP will:

- Review our processes annually to ensure that all conflicts of interest or potential conflicts of interest are managed and resolved.
- Ensure that the contractual arrangements clearly set out any obligations on them to declare and manage conflicts of interest arising from other activities that they undertake.
- Ensure that anyone who has access to confidential assessment material for a qualification understands the confidential nature of the content.

CWP Complaints & Compliments Policy

September 2021

Owner: Anita McGreevy

Review Date: August 2022

## Conflict of Interest Policy

- Ensure that all members of staff declare any interest for friends or family sitting examinations.

### Responsibilities

#### The Board of Trustees

The ultimate responsibility for the Conflict of interest policy, dissemination of the policy and management of potential and actual conflicts of interest rests with the Board of Trustees.

#### Management

The Compliance & Operation Manager and the Centre Manager are responsible for communicating the Conflict of Interest Policy to all relevant individuals within their areas of responsibility annually.

The Compliance Manager is responsible for ensuring that all new staff receive conflict of interest information. Any potential or actual conflict of interest must be documented by the Centre Manager.

The Centre Manager must either resolve the issue or, for issues that cannot be resolved at this level, report the issue to the Compliance manager who is directly responsible to the CEO who is in turn responsible to the Board of Trustees.

All Individuals within CWP have responsibility for ensuring that they are familiar with the Conflict of Interest Policy, any guidelines and complete any required conflict of interest training.

All individuals will be required annually to read and understand the Conflict of Interest Policy.

Everyone has a duty to disclose any activity that might give rise to a potential conflict of interest. If there is any doubt whether it represents a conflict of interest it should be reported.

The individual and line manager are equally responsible for ensuring that the issue is documented carefully.

An individual may wish to raise concerns relating to conflict of interest directly with the Centre Manager of anyone within the SLT. This may be done in confidence, and they are entitled to receive a response to their concerns.

Any staff member considering paid or unpaid work outside of CWP should inform their manager if they think there is any potential for a conflict of interest.

If the staff member is unsure whether a conflict of interest might arise, they should discuss this with their line manager first. The line manager should contact the CEO if they need advice on whether a situation presents a conflict, and a record should be kept of the discussion. A staff member must not take on any such activities that could be deemed to compete or conflict with CWP activities.

Prior to each examination series all staff and other individuals, must inform the Compliance Manager of any candidates being entered for its examinations and other assessments, who are family members, other relatives, or friends.

#### Responsible officer: monitoring and escalation

The Compliance Manager is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the business and, when necessary, to the Board of Trustees

The Compliance manager will begin an investigation of any issues identified within 48 hours.

A preliminary report will be made available to the CEO & Board of Trustees within 5 working days.

CWP Complaints & Compliments Policy

September 2021

Owner: Anita McGreevy

Review Date: August 2022

---

## Conflict of Interest Policy

### Monitoring

CWP will monitor and learn from both complaints and compliments given and use them to improve our services. This policy gives the minimum expectation set by CWP.