



**Conflict of Interest Policy
February 2021 to February 2022**

Introduction

CWLC Ltd consists of the following companies.

- *Bona Fide Site Services Ltd (Trading as CWLC)*
- *Yeti Partnerships Ltd (Trading as CWLC)*

The company is a private Training Provider who deliver a range of apprenticeships, nationally accredited qualifications and a selection of short accredited courses. The company are committed to providing a curriculum to develop a learner's skills and knowledge in order for our learners to become a valuable asset to any organisation.

The company is committed to being an Equal Opportunities Employer and Provider of Training in accordance with the Equality Act 2010 – *'legally protects people from discrimination in the workplace and in wider society. It replaces previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in certain situations.'*

Purpose

The purpose of this policy is to provide guidance regarding handling possible conflicts of interest that may arise as a result of CWLC delivering training or assessment to individuals or companies. This policy applies to all staff and other individuals whenever they interact or potentially interact with any accredited training. This policy:

- Defines what is meant by a conflict of interest.
- Sets out the Roles and Responsibilities and Procedures for managing conflicts of interest.

Scope

All delivery staff acting on behalf of CWLC must be free from conflicts of interest that could adversely affect their judgment or objectivity in awarding qualifications. If it is not possible to remove the conflict of interest, said conflict must be managed in order to ensure there is no adverse effect created.

CWLC recognise that some delivery staff may take part in legitimate activities outside of their roles with CWLC which could inadvertently create a conflict of interest. CWLC that conflicts of interest do

exist. However, any potential conflict of interest must be acknowledged, disclosed in order for the conflict to be properly managed.

It is the responsibility of each member of staff at CWLC to recognise situations in which there is a potential for a conflict of interest, or a situation which may reasonably be perceived by others to be a conflict. All perceived, potential or actual conflicts must be disclosed to the Head of Quality (Keith Horkan).

Definition of Conflict of Interest

A conflict of interest may generally be defined as 'a conflict between the official responsibilities of a Tutor, Assessor or member of staff and any other interests or relationships the individual may have that could compromise or appear to compromise their professional decisions'.

Conflicts of interest can arise in a variety of circumstances in relation to delivery of qualifications, for example:

- When an individual has personal interests that conflict with his/her professional position.
- Where someone works for or carries out work on behalf of CWLC who has friends or relatives undertaking a qualification.
- When an individual has a position of authority in one organisation which conflicts with his or her interests in another organisation.

Examples of Conflicts of Interest

It is not possible to provide a definitive list of examples of conflicts of interests, but the following are examples of situations that could lead to actual or perceived conflicts of interest:

- Tutors / Assessors / IQA working with a business other than CWLC which is in direct competition.
- Tutors / Assessors / IQA participating in the appointment, supervision evaluation or assessment of a person with whom the person has close or family ties.
- Tutors / Assessors / IQA having a close or family relationship with a registered learner, or learners' family whilst being involved in decisions about the outcome of their accreditation or qualification, or where the person whose remuneration is in part determined by the outcome of the assessment.
- An employee of CWLC working towards a qualification with CWLC .
- Tutors / Assessors / IQA using learner data for personal gain or advantage.
- An individual that is currently working or has worked with an Awarding Body in the past working with CWLC .

The existence of such interests as those outlined above, does not necessarily imply conflict, but is likely to give an appearance of conflict and as such should be declared. The list above is not exhaustive.

Roles and Responsibilities

All staff have a responsibility to be aware of the potential for a conflict of interest. It is likely that individuals working with CWLC will encounter potential conflicts of interest from time to time.

Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact on the standards of, or public confidence in, regulated units and qualifications or on the reputation of CWLC or any Awarding Body.

It is the duty of all staff at CWLC to disclose any actual or potential conflict of interest.

Procedure

Any potential or actual conflict of interest should be disclosed to the Lead IQA. In the instance that the Lead IQA is involved in the conflict, the issue should be disclosed to another member of the Senior Management Team (SMT).

Conflicts should be recorded on a conflict of interest form which will be maintained by the IQA. In the instance that the conflict involves the IQA, another member of the SMT should verify the form.

Dependent upon the rules of the particular Awarding Body involved, the conflict should be disclosed to the External Quality Assurance Team (EQA) or the Quality Assurance Manager (QAM).

If there are any changes to the declared circumstances of the member of staff, the IQA must be informed/updated immediately in writing so that the conflict of interest can be (re)evaluated. The information submitted must be evaluated to identify if any further action is required. A written record of the outcome will be kept on file.

Examples of Corrective Action

- Ensure the individual is not allocated work for the particular learner under the conflict and not taking part in discussions or training/assessment decisions.
- Referring certain matters such as assessment, verification and recommendations for credit for decision to other Tutors / Assessors / IQA with no vested interest.
- Declining involvement in projects.
- Declaring an interest when it is appropriate to do so.
- Referring the matter to the SMT for advice and guidance.
- Individuals upholding any codes of practice and confidentiality requirements for all organisations, including Awarding Bodies that they work or have worked for.

The list above is not exhaustive.

Signature:	
Name:	Keith Horkan
Position in Company:	Head of Quality
Date:	11.2.21
Due for Review:	311.2.22

