



Westwood Training and Consultancy

Conflicts of Interest Policy

Purpose

This document sets out WTC's Conflicts of Interest Policy and procedure and is for learners, staff, applicants, visitors and any interested parties who are engaged either directly or indirectly with WTC activities.

The document outlines our broad approach to identifying and monitoring all actual/potential conflicts of interest that may affect WTC both now and in the foreseeable future.

Policy Statement

We value all our learners, staff and visitors, and aim to provide excellent service and training in all aspects of what we do including delivery of learning and assessment. This will be done so in a professional manner and with consideration of rigour and validity.

Scope

This policy covers conflicts of interests identified by learners, stakeholders, staff, contractors or members of the public who may wish to raise a concern in relation to the activities of WTC.

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.

A simple definition of conflict of interest is a situation in which an individual or organisation has competing interests or loyalties.

The following are examples of conflicts or potential conflicts of interest. These are intended to be helpful to staff in making decisions that relate to potential conflict of interest situations in their day-to-day work.



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In essence a conflict of interest exists in relation to WTC 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 delivery of qualifications in accordance with the requirements of Crossfields Institute
- A person who is connected to the delivery of qualifications at WTC has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that delivery and impact on our compliance with the requirements of Crossfields Institute
- If a teaching member of staff is involved in any way with the development of a secure assessment for either internal or national use, he or she cannot make use of the knowledge of that assessment in any teaching or learning activity
- The appointment of all assessors, invigilators, internal verifiers and assessment- related administrative staff is not made against published criteria and on a transparent basis
- Assessors, invigilators, internal verifiers and assessment related administrators do not take responsibility to ensure the security and confidentiality of all assessment instruments, including examination papers.
- Learning and teaching materials are based on live examination of other assessment materials (although they can make use of past examination of other assessment materials)
- A member of staff is asked to assess, invigilate or internally verify the work of an enrolled student who is a family member, other relative, close friend or colleague undertaking CPD within the college
- A member of staff makes assessment materials available to individuals, whether or not students of the Centre, when not specifically tasked with assessing them as part of a timetabled activity.
- In the case of any situation where an assessor carries out assessment on behalf of WTC in an organisation where they are also employed, they must adhere to the relevant assessment strategy and the quality standards set by the Centre.

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:



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- All managers and staff must commit to identifying and managing all actual/potential conflicts of interest that may affect WTC and in doing so raise possible conflicts of interest with the Principal if in doubt.
- Staff must be proactive in the identification and management of conflicts of interest that may affect our effectiveness, level of compliance with Crossfields Institute requirements 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 compliance with Crossfields Institute requirements
- Strive to identify and deal with conflicts of interest sooner rather than later
- Our controls to managing any potential conflicts of interest must be proportionate to the risks associated with the identified conflict(s)
- All potential and actual conflicts of interests will be recorded along with all mitigating circumstances on the register of conflicts of interest. This information will be held securely on site and shared with Crossfields Institute/CACHE where necessary. Please see our Privacy Policy for further details.

Dealing with Conflicts of Interests

Should the member of staff and/or a learner believe there has been a breach of this policy, or unforeseen conflicts of interest emerge, Liz Barclay, at the email address below, must be informed and an investigation carried out immediately along with a review of the associated procedures. Staff and contractors will be expected to record any potential conflicts of interest on the register of conflicts of interest along with any mitigations to prevent a conflict from arising.

Should an external party feel there has been an actual conflict of interest involving WTC then they should raise the matter with the Liz Barclay who will begin an investigation unless they have an involvement/interest in the allegation in which case it will be passed to Crossfields Institute to lead the investigation (or if required an alternative member of staff or external party will be appointed to carry out the review) and the outcomes reported to the Principal and/or to Crossfields Institute.

At all times we will ensure that personnel assigned to the investigation have the appropriate level of competence and they have had no previous involvement or personal interest in the matter.

If you have any queries about the contents of the policy, please contact Liz Barclay liz@westwoodtrainingandconsultancy.org



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If you are still unhappy with the decision taken by WTC in reviewing the complaint you can, where relevant, take the matter through our Appeal arrangements which are outlined in our Appeals Policy.

If after exploring the appeal procedure you are not satisfied with the response you get from WTC, or have reached the end of a process with us, please contact Crossfield's Institute directly. You can contact the Quality Team at: quality@crossfieldsinstitute.com.

Crossfield's Appeals and Complaints and Assessment policies can be found on the [Resources](https://crossfieldsinstitute.com) section of their website <https://crossfieldsinstitute.com>.

Associated Policies and Procedures

Learner recruitment policy
Complaints Policy
Appeals Policy
IQA Policy
Reasonable adjustments policy
Malpractice policy

Review

The policy will be reviewed in September 2022

We will review this policy and its associated procedures annually as part of our self-evaluation arrangements and/or in response to customer, or regulatory feedback and any trends that may emerge in the types of queries we may have received.