

Conflicts of Interest Policy

Introduction

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

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 Learning 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 Crossfields Learning 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
- An informed and reasonable observer would conclude that either of these situations was the case

Overview

Members of staff are expected to identify and inform the Head of Centre of any actual/potential conflicts of interest that could impact Crossfields Learning.

Overall our compliance with regard to identifying and managing any conflicts of interest will be reviewed regularly by our Management Board.

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 managers and staff must buy into and commit to identifying and managing all actual/potential conflicts of interest that may affect Crossfields Learning and in doing so raise possible conflicts of interest with the Head of Centre 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

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- Our controls to 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 the member of staff and/or the Head of Centre believe there has been a breach of this policy, or unforeseen conflicts of interest emerge the Head of Centre 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 Learning then they should raise the matter with the Head of Centre who will begin an investigation (contact details below) unless they have an involvement/interest in the allegation in which case it will be passed to the Director 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 Management Board. 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.

Contact

If you have any queries about the contents of the policy, please contact:

Head of Centre: Jonathan Code – jonathan.code@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 awarding organisation feedback.

This policy will be reviewed every 12 months by Crossfields Learning's Director and/or Head of Centre.