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POLICY & PROCEDURES

CONFLICT OF INTEREST

REFERENCE	PPCIV2026AB 26
ISSUE DATE	30.04.26
REVIEW DATE	30.04.27



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1. SCOPE

This policy applies to all individuals working for or on behalf of Crosby Training. It complements other organisational procedures and supports decision-making across all business areas, including teaching, assessment, and organisational governance.

2. POLICY STATEMENT

The purpose of this policy is to safeguard the integrity, transparency, and reputation of Crosby Training's business activities and decision-making processes. All staff and contractors are personally responsible for adhering to this policy.

A conflict of interest arises when personal, financial, or other loyalties could compromise objectivity, influence decision-making, or give rise to perceived or actual bias. A perceived conflict exists where there appears to be a risk of bias, even if none is intended or actual - for example, where a staff member's family member is a learner in their assessment group. Conflicts may be:

Pecuniary - financial interest in a supplier or competitor;

Relational - family or close personal relationships influencing decisions;

Operational - competing employment, voluntary roles, or external commitments that could interfere with responsibilities;

Assessment-related - access to confidential assessment materials, marking, or QA activities where impartiality may be compromised.

Crosby Training is committed to:

- Identifying and mitigating conflicts proactively;
- Ensuring decisions are made in the best interests of the organisation, learners, and stakeholders;
- Maintaining records of all declared conflicts;
- Upholding regulatory and safeguarding standards, including Ofqual conditions where applicable.



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3. RISK ASSESSMENT & CATEGORISATION

Conflicts of interest are assessed according to the level of risk they pose, using the following decision criteria:

Low risk involves no material influence on outcomes;

Medium risk could affect operational or financial choices;

High risk threatens regulatory compliance, assessment integrity, learner safety, or Ofsted inspection impartiality.

Risk Level	Definition	Action Required
Low	Minor or foreseeable conflict unlikely to affect decisions	Record on HR file and central Conflicts Register; monitor periodically
Medium	Conflict could influence operational or financial decisions	Line manager review; mitigation plan documented and approved
High	Conflict could compromise regulatory, legal, or safeguarding obligations	Escalate to Governance & Leadership Team; implement formal mitigation plan

All conflicts must be assessed, recorded, and reviewed, with responsibility shared between line managers, HR, and senior leadership.

4. ROLES & RESPONSIBILITIES

Senior Management Team (SMT)

- Ensure the policy is implemented and complied with across the organisation.
- Escalate high-risk conflicts to the Governance & Leadership Team.
- Maintain confidentiality while overseeing risk mitigation.
- Oversee preparation for Ofsted inspections, ensuring no conflicted staff contribute to evidence submission or self-evaluation.



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HR and Operations

- Monitor staff compliance and maintain Conflict of Interest records in HR files and a central digital Conflicts Register (accessible only to authorised personnel).
- Ensure conflicts are declared during induction and updated if circumstances change.
- Support line managers in assessing and mitigating risks.
- Retain all records for a minimum of 6 years after the interest expires, with historic interests kept privately for audit purposes.

Line Managers

- Review declarations and implement mitigation strategies for medium-risk conflicts.
- Monitor ongoing compliance and provide guidance to staff.
- Escalate high-risk conflicts to SMT or Governance & Leadership Team as needed.
- Approve or deny additional paid/voluntary work based on conflict assessment.

Staff and Contractors

- Declare any real, potential, or perceived conflict of interest promptly.
- Follow agreed mitigation measures and provide updates if circumstances change.
- Seek guidance when unsure whether a situation constitutes a conflict.

5. DECLARATION & RECORD KEEPING

All individuals must complete a Conflict of Interest Declaration during induction and update it whenever relevant circumstances change (within 28 days).

Declarations include:

- Pecuniary interests (employment, business ownership, directorships, charity trusteeships)



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- Personal relationships that could influence decisions
- Receipt of gifts or hospitality
- Contracts offered to or by the individual
- Assessment-related access or roles

Declarations are retained securely in HR files and the central Conflicts Register. Paper records are permitted; digital records must be used for internal audit purposes and Ofsted compliance demonstrations.

6. MANAGEMENT OF CONFLICTS

Low-risk: Record and monitor; no further action required unless risk escalates.

Medium-risk: Line manager implements and documents an approved mitigation plan (e.g. recusal from decision-making, separation of duties, independent verification).

High-risk: Governance & Leadership Team (largely independent) conducts a formal review, chaired by an independent member where possible; implement mitigation plan including potential suspension from related activities until resolved. Mitigation options include mandatory recusal, independent second-checking of decisions, segregation of duties, or full role reassignment to preserve impartiality.

Practical examples (*not exhaustive*):

- Staff member assessing learners on a qualification in which a close relative is enrolled.
- Staff member holding a financial interest in a supplier being considered for contract award.
- Quality Assurance staff attending training or external events where assessment material may be compromised.



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7. ASSESSMENT & QUALITY ASSURANCE

Staff involved in assessment or QA must:

- Avoid participating in assessment decisions where a conflict exists;
- Declare any potential conflicts before registration or marking;
- Follow mitigation plans provided by line management or SMT.

Where any real, potential, or perceived conflict arises (e.g., personal relationship with a learner), staff must recuse themselves fully, with independent staff taking over marking, IQA, QA, or moderation to protect integrity.

- All activities are aligned with Ofqual's General Conditions of Recognition, ensuring assessment integrity.

8. ADDITIONAL PAID WORK & EXTERNAL ROLES

Staff must seek written approval from their line manager before undertaking additional employment or voluntary roles.

Activities must not conflict with Crosby Training's interests or compromise impartiality.

9. GIFTS, HOSPITALITY & BENEFITS

All offers of gifts, hospitality, or benefits (regardless of value) must be declared immediately.

Gifts valued at £40 or under may be retained after declaration; higher-value items must be declined, shared, donated to charity, or returned, with equivalent charitable donation if kept. Hospitality is accepted only for genuine business reasons (e.g., training events) and declared if over nominal value. No undeclared benefits are permitted to avoid bribery perceptions.



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10. SAFEGUARDING & COMPLIANCE

Conflicts of interest may intersect with safeguarding responsibilities.

Staff must follow safeguarding procedures if a conflict could affect learner safety.

Whistleblowing mechanisms are available for confidential reporting of concerns.

11. REVIEW & MONITORING

The policy is reviewed annually or following regulatory changes, significant incidents, or internal audit findings.

Conflicts of interest are monitored as part of ongoing risk management and quality assurance.

Audit records are maintained in HR files and reviewed by SMT and the Governance & Leadership Team. The central register will be audited annually by independent review.

12. RELATED POLICIES

- Whistleblowing Policy
- Safeguarding Policy
- Complaints and Appeals Policies



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APPENDIX: Crosby Training Conflict of Interest Declaration

Name of Employee	
Position	
Pecuniary Interests	Details of Interest
Current employment/s	
Businesses (<i>of which I am a partner or sole proprietor</i>)	
Company directorships - give details	
Charity trusteeships - give details	
Membership of professional bodies, membership organisations, public bodies of which I am a member and have a position of general control or management	
Gifts or hospitality offered to you by external bodies while acting in your position as a staff member and whether accepted or declined in the last 12 months	
Contracts offered by you for the supply of goods and/or services to another company	
Any other conflict of interest	
Personal Interests	Detail: Name, Relationship to me, Organisation, Nature of Interest
Immediate family / close connection to Learner / Staff / Partner institution / Awarding Body / Funder	
Company directorships or trusteeships of Partner Institutions / Awarding Bodies	
<p>I, _____ declare that the information submitted above is accurate at the time of completion to the best of my knowledge.</p> <p>Signature Date</p>	