

Conflict of Interest Policy

Version 1.0 (August 2020)

Prepared by: Wole Koiki

Checked and approved by: Ferdinand Joseph

Date: 03/08/2020

Next review due: 03/08/2021

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Scope and purpose of the Policy:

This policy applies to all individuals working for or on behalf of Cube Training, including all colleagues at all locations and at all levels including members of the Board, the Executive Team, external contractors, agency workers, partners, suppliers, centres, customers, any associates, any subsidiaries or their employees or any other person associated with us (collectively referred to in this document as 'individuals')

This policy extends to all of Cube Training's dealings and transactions in all countries in which it or its consultants, partners, stakeholders and associates operate.

This policy covers conflicts of interest for the Cube Training Group. This document supports specific Awarding and / or conflicts of interest procedures that relate to potential learner-centric conflicts, such as teaching and assessment delivery.

This policy sets out the responsibilities on all individuals, in line with their contract of employment (or other contractual arrangement), in supporting us to meet the requirements set out by the Charity Commission and in our regulators' Conditions of Recognition.

This policy and associated procedure supports us in ensuring that working relationships with colleagues, stakeholders, partners and customers do not conflict with our requirement to engage in business relationships in a legal, transparent, ethical and responsible manner.

Cube Training recognised that conflicts of interest may arise that could lead to individuals making decisions, or appearing to make decisions, that are based on personal interest and not the interest of the organisation or what is ethically correct. Such conflicts of interest may also constitute a form of corruption. Cube Training has a policy on anti-bribery and corruption, which can be downloaded from our website www.learninstallation.co.uk (or, for colleagues, via the company website).

Policy Statement:

For the purpose of this policy a conflict of interest is defined as a situation in which an individual, or organisation, has, or may be perceived to have –

- competing interests or loyalties which could lead to a potentially subjective, biased or corrupt decision being made by that individual or organisation.

Cube Training recognises and encourages the promotion of building successful business and external relationships. In doing so, we are mindful that there may be situations when a

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perceived or potential conflict of interest may arise and that we have a duty to identify, manage and mitigate potential conflicts of interest. As such where a potential conflict may be identified we will follow the procedure outlined in this document.

Location and Access to the Policy:

The Conflict of Interest Policy is located as follows:

- Intranet: Staff
- Website: Stakeholders

Persons Responsible for the Policy:

Managing director

Risk management in relation to conflicts of interest:

Assessing the risks to Cube Training arising from potential conflicts of interest is an integral part of Cube Training's overall and ongoing risk management process. Identified conflicts of interest are mitigated as far as possible, and are monitored as part of overall risk management and internal control processes.

Periodic reviews of our conflicts of interest policy and procedures are undertaken as part of our governance and accountability processes. All existing and reasonably foreseeable conflicts of interest will be identified and monitored by our organisation in line with this procedure and escalated to an Executive Member/Trustee where appropriate.

Documented conflicts of interest will be monitored closely, particularly during periods of change, in order to mitigate the possible impact of any potential Adverse Effect, as specified in our regulators' Conditions of Recognition.

Prevention of conflicts of interest within the Cube Training Group:

No colleague within the Cube Training Group shall provide or accept preferential treatment (including discounts on services) to or from any colleague or any other part of Cube Training Group, where such a transaction may adversely affect the business; learners, centres or other relevant parties. Such actions may also be construed as bribery and may be subject to criminal prosecution.

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Our stakeholders (including centres, customers and contractors):

In line with our contractual agreements, including our Centre Agreement, we expect our centres, customers and contractors:

- to read and abide by the contents of this policy
- to adhere to any contractual arrangement you may have with us in relation to conflicts of interest
- to have a dedicated conflicts of interest policy and procedures which can be produced on request by our colleagues, including our contractors
- to fully adhere to those policies and procedures in the identification, minimisation and mitigation of risks relating to conflicts of interest
- to tell us when an incident of, or a significant risk incident of a conflict of interest that may adversely affect the Cube Training Group has been identified.

Executive team:

The Executive team are responsible for ensuring this policy is complied with throughout and across the Group, including their personal compliance. The Executive Members are responsible for reporting any identified or potential conflicts of interest that are specific to another member of the Executive Team to the Chair of the Audit, Risk and Investment Committee.

Management receiving a Conflict of Interest notification

All managers/senior colleagues receiving information on actual or potential conflicts of interest will ensure that potential conflicts not causing a significant risk to the business are appropriately recorded, monitored and managed.

Conflicts, or potential conflicts, that may pose a significant risk to the business must be escalated in confidence to an Executive Member, in order that appropriate steps may be taken to minimise any risks and where possible resolve the issue. Where conflicts relate to our staff or member(s) of the Board, advice from the Director of People must be sought at the earliest opportunity by the most senior receiving manager (usually a Senior Leadership Team /Executive member), particularly in relation to confidentially and securely recording the conflict.

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The director will support in the evaluation of whether any identified significant risks that may result in a specified Adverse Effect (as outlined in the General Conditions of Recognition) and may require reporting to the appropriate awarding regulator(s). Potential cases which may introduce other regulatory risks (e.g. those governed by other specific legislation) will also be escalated by the most senior receiving manager to the appropriate Business Unit Director / Executive Member (e.g. Chief Finance Officer for finance regulators such as HMRC). This will allow the evaluation of whether external specialist advice is required in assessing/mitigating the risk.

Additional paid work:

Colleagues are expected to devote their working time to the Cube Training Group as outlined in their contract of employment. Any colleague considering undertaking additional paid work (on either an employed or self-employed basis) or voluntary work outside Cube Training must seek their line manager's written agreement beforehand, as stipulated in the colleague's contract of employment. Colleagues are not permitted to take on any such activities that could be deemed to compete or conflict with Cube Training's activities.

All other individuals (e.g. contractors) must follow the procedures set out by the relevant department within the Cube Training Group and / or contained within their contract for services.

Potential for conflicts with regards to Cube Training qualifications:

Colleagues engaged in a team or role which has access to qualification assessment materials, content or mark schemes may not be permitted to take an Cube Training qualification due to the risk of a high conflict of interest and the potential impact on our regulatory requirements. Such colleagues must speak to their line manager prior to registering for a Cube Training qualification.

Anyone who has access to confidential assessment material for a qualification is not permitted to deliver external training on that qualification. Such colleagues must consult with their line manager should they wish to attend these training events.

How to contact us:

If you have a concern or query about conflicts of interest you can contact us via phone or email.

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*To continue to improve our levels of customer service, telephone calls may be recorded for training and quality purposes.

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