

Graspp Fitness Conflicts of Interest Policy

This document outlines Graspp Fitness intention to identify and monitor all actual or potential conflicts of interest that may affect Graspp Fitness both now and in the foreseeable future, and in doing so, record possible conflicts of interest that have been identified to date and the arrangements in place to prevent these from occurring.

This policy should be read alongside Graspp Fitness Terms and Conditions (Centre Agreement), Sanctions policy and Malpractice & Maladministration policy. This policy and other relevant material may be provided to the regulators upon request, to satisfy them of Graspp Fitness ability to comply with their requirements in relation to conflicts of interest, and to prevent such conflict having an 'Adverse Effect' (as defined by the regulators).

Review arrangements

Graspp Fitness will review this document annually as part of our self-evaluation arrangements. However, a review may 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 regulatory feedback.

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 Graspp Fitness, or any of its approved centres, where:

- its interests in any activity undertaken by it, on its behalf by a centre, or by a member of staff have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications in accordance with the requirements of the regulator's Conditions of Recognition,
- a person who is connected to the development, delivery or award of qualifications at Graspp Fitness has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award and impact on our compliance with the requirements of the regulator's Conditions of Recognition,
- a member of staff at an Graspp Fitness centre connected to the delivery or assessment of our qualifications has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in the delivery or assessment of our qualifications
- an informed and reasonable observer would conclude that any of these situations was the case.

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As an organisation that keeps all aspects of its business under review, Graspp Fitness individual teams are expected to identify and inform the Managing Director, of any actual/potential conflicts of interest that could impact Graspp Fitness. In addition, they are required to manage and monitor any identified conflicts of interest that relate to their area of operations. Should the status of any identified conflict, or the associated controls change, then the relevant Head of Department will inform the appropriate Director so they can take the appropriate action. This approach aims to

remove, mitigate or manage all identified conflicts of interest, thereby protecting the integrity of the qualification, assessment and associated standards required from all stakeholders invested in the outcomes and achievement of all Graspp Fitness registered learners.

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 Graspp Fitness and, in doing so, raise possible conflicts of interest with the Managing Director.
- Staff must be proactive in the identification and management of conflicts of interest that may affect, for example, Graspp Fitness effectiveness, level of regulatory compliance 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 regulatory compliance
- Strive to identify and deal with conflicts of interest as soon as they are identified
- Controls for 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 outlined in this policy

Where any member of staff within Graspp Fitness believes there has been a breach of this policy, or if unforeseen conflicts of interest emerge, the Managing Director will be informed and an investigation carried out immediately along with a review of the associated procedures. Such reviews will be led by the Managing Director and the outcomes reported to the Governing Body. If the breach is also classified as an Adverse Effect, then the Managing Director will promptly inform the regulators in accordance with our procedure for dealing with Adverse Effects. In doing so, they will also inform the regulators of the reasonable steps that have been taken or intend to take to prevent, correct or mitigate the Adverse Effect. Including details of any reviews Graspp Fitness agrees to carry out.

Graspp Fitness Conflict of Interest Policy 2022: www.grasppfitness.co.uk

For information, the regulatory definition of an Adverse Effect is: An act, omission, event, incident, or circumstance has an Adverse Effect if it –

- (A) gives rise to prejudice to Learners or potential Learners, or
(B) adversely affects –

(i) the ability of the awarding organisation to undertake the development, delivery or award of ` qualifications in accordance with its Conditions of Recognition,

(ii) the standards of qualifications which the awarding organisation makes available or proposes to make available, or

(iii) public confidence in qualifications. Contact If you have any queries about the contents of the policy, please contact the Managing Director via email: