

Conflict of Interest Policy

Purpose:

The purpose of this Conflict-of-Interest Policy is to establish and uphold a culture of integrity, ensuring that all decisions and actions are made in the best interest of our stakeholders. This policy provides clear guidelines and procedures to identify, disclose, and effectively manage conflicts of interest that may arise among our employees, contractors, volunteers, board members, and any other individuals associated with our organisation. By proactively and transparently addressing conflicts of interest, we aim to maintain the trust, credibility, and fairness of our operations while adhering to the regulatory standards set by UK Awarding Organisations.

Scope:

This policy applies to all employees, contractors, volunteers, board members, and individuals who may have a potential conflict of interest whilst undertaking activity for our organisation.

Definition of Conflict of Interest:

A conflict of interest occurs when an individual's personal, financial, or other interests potentially compromise, or appear to compromise, their ability to make objective and unbiased decisions in the best interest of our organisation. Examples of conflicts of interest that apply to education provision could include:

- an assessor, acting on behalf of or directly employed by the centre, who may have a vested interest in the outcome of an assessment (e.g. an assessor assessing a family member, close friend or colleague)
- an Internal Quality Assurer (IQA) who has a vested interest in the outcome of an assessment (e.g., where a learner is a relative or close friend)
- an assessor or IQA who gains a financial reward based on the outcome of assessments undertaken by them over and above the normal pay/salary (e.g. a bonus based on achievement rates)

Disclosure of Conflict of Interest:

All individuals covered by this policy have a continual responsibility to promptly disclose any actual, perceived, or potential conflicts of interest. This includes conflicts arising from financial relationships, personal relationships, outside employment, gifts, or any other interests that could influence their decision-making.

Procedures for Disclosure:

When an individual becomes aware of a conflict of interest or a potential conflict, they must promptly disclose the details to their immediate supervisor or the designated person

responsible for conflict-of-interest matters. The disclosure should include relevant facts and circumstances, as well as any proposed measures to mitigate or manage the conflict.

Evaluation and Management of Conflicts:

Upon receiving a disclosure, the designated person responsible for conflict-of-interest matters will conduct a thorough evaluation to assess the significance and potential impact of the conflict. They will consider relevant information and may seek additional advice or expertise as needed to make an informed decision.

The evaluation process will be fair, objective. Factors such as the nature and extent of the conflict, its potential influence on decision-making, and the potential risks to our organisation's interests will be carefully considered. Based on the evaluation, the designated person responsible for conflict-of-interest matters will determine appropriate management strategies.

These strategies may include:

1. **Disclosure and Transparency:** Where applicable, the conflict of interest will be disclosed to relevant parties, ensuring transparency, and allowing for informed decision-making.
2. **Recusal and Impartiality:** Individuals with a conflict of interest will be appropriately recused from decision-making processes to ensure impartiality and prevent the compromise of our organisation's interests.
3. **Mitigation Measures:** Steps will be taken to mitigate the impact of the conflict, which may include modifying responsibilities, reassigning tasks, or implementing safeguards to minimise the potential influence of the conflict.
4. **Independent Review:** In certain cases, an independent review or oversight process may be initiated to ensure the fairness and integrity of decision-making related to the conflict of interest.

The designated person responsible for conflict-of-interest matters will maintain clear documentation of the evaluation process, the decision made, and any actions taken to manage the conflict. This documentation will be securely stored and made available for review as required.

Reporting to UK Awarding Organisation:

If a conflict of interest arises that may impact the integrity or fairness of assessments or qualifications regulated by a UK Awarding Organisation, the designated person responsible for conflict-of-interest matters shall promptly report the conflict to the relevant UK Awarding Organisation in accordance with their reporting requirements and guidelines.

Managing Conflicts of Interest in Subcontracting for Education Provision:

Recognising the potential for conflicts of interest to arise in subcontracting arrangements for education provision, our organisation implements the following measures to effectively manage such conflicts:

- 1. Transparency:** We ensure transparency in all subcontracting relationships by disclosing any known or potential conflicts of interest related to subcontracting arrangements to the relevant parties involved.
- 2. Fair Selection Process:** The subcontracting selection process is conducted in a fair, impartial, and objective manner. Any individuals involved in the selection process who have a conflict of interest must disclose it and be appropriately recused from decision-making.
- 3. Monitoring and Oversight:** We establish mechanisms to monitor and oversee subcontracted education provisions, ensuring compliance with contractual obligations and regulatory requirements. This includes periodic reviews and assessments of subcontractors' performance and adherence to ethical standards.
- 4. Mitigation Strategies:** In cases where conflicts of interest exist or arise during subcontracted education provision, our organisation implements appropriate mitigation strategies. These may include disclosing the conflict to relevant parties, modifying the subcontract agreement, or seeking independent review or oversight of decision-making processes.
- 5. Recordkeeping:** We maintain accurate and comprehensive records of subcontracting arrangements, including disclosed conflicts of interest and the actions taken to manage them. These records are securely stored and made available for review as required.

Annual Review and Compliance:

This Conflict-of-Interest Policy shall be reviewed annually to ensure its effectiveness and relevance in the context of our UK education provider. All individuals covered by this policy are expected to familiarise themselves with its contents and fully comply with its provisions. Failure to comply may result in disciplinary actions, up to and including termination of employment or contract.

Training and Education:

Regular training and educational programmes are conducted to raise awareness about conflicts of interest, promote understanding of this policy, and provide guidance on identifying and managing conflicts appropriately within the context of our UK education provider.



This policy has been approved and signed by:

Paula Litherland, Director. 01.12.22

Nicola Simcock, Director. 01.12.22