

## Conflict of Interest Policy

In line with the Conditions of Recognition set out by the regulator of qualifications in England (Ofqual), the regulator of qualifications in Wales (Qualification Wales) and the regulator of qualifications in Northern Ireland (CCEA Regulation), Fit4Training at all times maintains and implements a robust conflict of interest policy with respect both to its own operations and in setting requirements for our staff and our learners.

### Policy overview

This document sets out Fit4Trainings' approach to identifying and managing conflicts of interest. This policy includes reference to the management of conflicts of interest within Fit4Training. The structure of this document is as follows:

- Definition of conflict of interest
- Example conflicts of interest
- Identification and management of conflicts of interest within Fit4Training

### Definition of conflict of interest

Fit4Training has a regulatory responsibility to manage conflicts of interest in relation to:

- a) Our interests in any activity undertaken by us, or on our behalf, which may have the potential to lead us to act contrary to our interests in the delivery and assessment of qualifications in accordance with the regulators' Conditions of Recognition.
- b) A person who is connected to the delivery and assessment of qualifications by Fit4Training who 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 assessment in accordance with the regulators' Conditions of Recognition.
- c) An informed and reasonable observer would conclude that either of the situations outlined in a) and b) is the case.

In order to meet these responsibilities, Fit4Training is required to:

- a) Identify and monitor all conflicts of interest which relate to our activities as a training provider.
- b) Identify and monitor any scenario in which it is reasonably foreseeable that any such conflict of interest will arise in the future.
- c) Establish and maintain an up to date record of all conflicts of interest which relate to our activities as a training provider.
- d) Take all reasonable steps to ensure that no conflict of interest has an Adverse Effect. An Adverse Effect describes situations in which a learner or learners may have received an unfair advantage or disadvantage and/or any of the following are compromised: our ability to undertake the delivery and assessment of qualifications in accordance with the regulators' requirements; the standards of our qualifications; public confidence in qualifications.

e) Take all reasonable steps to avoid any part of the assessment of a learner (including quality assurance) being undertaken by any person who has a personal interest in the result of the assessment, or, in cases where this is not possible, to make arrangements for the relevant part of the assessment to be subject to scrutiny by another person.

To meet these obligations and to ensure the on going validity of our qualifications, we manage conflicts of interest that can occur during the delivery, assessment and internal quality assurance of our qualifications and we monitor and record this activity.

## **Example conflicts of interest (Fit4Training)**

Examples of potential conflicts of interest which we are responsible for identifying and managing include (but are not limited to):

- An assessor, acting on behalf of or directly employed by Fit4Training, 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).

## **Identification and management of conflicts of interest within Fit4Training**

### Roles and Responsibility

It is the responsibility of individual members of staff to inform their line manager of any possible conflicts of interest; for those situations where a conflict of interest may arise, appropriate arrangements must be put in place to ensure that the potential conflict of interest cannot influence the outcome of an assessment. Line managers are responsible for recording all conflict of interest declarations and sharing these with Fit4Trainings' Responsible Officer.

It is the responsibility of all Fit4Training staff and freelance assessors and quality assurers, to declare any potential or actual conflict of interest at the point of recruitment, and to adhere to the conflict of interest information provided within their contract. In addition, during staff induction, we establish whether conflicts of interest and related threats to the maintenance of the confidentiality of our assessments exist or may be likely to occur. In some circumstances, potential or actual conflicts of interest may be identified and options to manage the conflict explored during recruitment. Where new conflicts or potential conflicts arise following recruitment and induction, it is the responsibility of the staff member or freelancer to notify their line manager as soon as reasonably possible.

### Freelance associates: additional requirements

Where Fit4Training recruits individuals to work on its behalf, such as freelance assessors, Internal Quality Assurers, we ensure that any actual or perceived conflicts of interest are declared at the point of recruitment or induction. Where

necessary and appropriate for ongoing monitoring, these details are kept by Fit4Training and considered when making decisions about workload allocation.

Contracts for freelance associates who will have access to confidential assessment materials include a clause that prohibit the associate from disclosing the content of confidential assessment to any third party, including restrictions on the development of teaching and learning resources relating to such assessment content.

#### Positions of responsibility with other organisations

Where an employee, or someone who works on behalf of Fit4Training, wishes to accept a paid or unpaid position with another organisation, such as another training provider related to the qualifications we offer, which might pose a potential conflict of interest, they must discuss the matter with their line manager.

If deemed appropriate, steps will be put in place to manage any potential conflict of interest. Such permission will not be unreasonably withheld, but Fit4Training retains the right to refuse permission where it is felt there would be a conflict of interest or the employee would find difficulty in fulfilling both roles.

#### Investigating concerns relating to conflicts of interest

The Fit4Training Responsible Officer is responsible for investigating credible concerns relating to conflicts of interest, whether these have been declared by the individual(s) or not. This applies to concerns raised in relation to conflicts of interest within Fit4Training as well as concerns relating to learners, which are brought to the attention of Fit4Training. In situations where the conflict of interest relates to the Responsible Officer, an independent party will investigate and make recommendations on actions required to the Director of Fit4Training.