

Conflicts of Interest Policy


November 2024


Policy Review

This policy will be reviewed in full by the Directors on an annual basis unless circumstances require policy update in the interim.

The policy was last reviewed and agreed by the Directors on 01.11.24.

It is due for review on 01.09.25 (up to 12 months from the above date).

Signature (CEO)  Date01.11.24.....

Signature (COO)  Date01.11.24.....

Version Control

Version	Date	Changes
V1	01/011/24	Original document

1. Introduction

1.1. This policy details what a conflict of interest is, how a conflict is declared and to whom and what the procedure is for dealing with a conflict of interests.

1.2. The purpose of this policy is to:

- a) Provide a definition of a conflict of interest.
- b) Provide examples of conflicts of interest.
- c) Outline the procedure for declaring a conflict of interest in Edit Education.
- d) How Edit Education will deal with any conflict of interest.
- e) Support compliance with Awarding Organisation requirements.

2. Who is this policy for?

2.1. The intended audience for this policy is:

- a) Students registered at Edit Education.
- b) Tutors, Assessors and IQAs and other delivery staff at Edit Education.
- c) The registered Awarding Organisation for the product being delivered.

3. What is a conflict of interest?

3.1. Conflicts of interest can arise in a variety of circumstances for example:

- a) The assessment of a student being undertaken by a person who has a personal interest in the result of the assessment.
- b) An assessment and internal quality assurance activity undertaken by the same person.
- c) An assessment delivered by a person that has trained the student.
- d) Anyone with a personal interest in the outcome of an investigation into potential malpractice or a breach of confidentiality from carrying out the investigation into malpractice or breach of confidentiality.
- e) Anyone with a personal interest in the decision being appealed from taking decisions on that appeal.
- f) Anyone with a personal interest in a complaint being reviewed from taking decisions on that complaint.
- g) A member of Edit Education staff pursuing a qualification offered by the Centre.
- h) Assessing an individual with whom they have a close financial or personal relationship.
- i) A member of Edit Education staff has a partnership or subcontracting agreement with a third party which both parties have an interest.
- j) Staff and third parties who have access to confidential assessment information also have roles in teaching or assessing students in the subject area.

- k) Staff and third parties who have access to confidential assessment information have a family member, friend or colleague who is due to take those assessments.
- l) [This is not an exhaustive list so add further examples where necessary]

4. Managing a conflict of interest

- 4.1. Edit Education will maintain a register of Conflicts of Interest. This will be maintained and updated by the CEO.
- 4.2. All new employees will be required to complete a Conflicts of Interest declaration form when starting their employment. The form must be returned to the CEO.
- 4.3. All Edit Education staff will complete an annual Conflict of Interest form at the start of each academic year (September) and submit this to CEO.
- 4.4. If the individual concerned has any changes to their declared circumstances at any time, they must inform the CEO immediately in writing, so that the conflict of interest can be evaluated, and the register updated. An individual must declare any interests that might lead to an actual, potential or perceived conflict of interest as soon as they are aware of them.
- 4.5. Individual Edit Education staff should not determine how to appropriately manage their own declarations.
- 4.6. Conflict of Interest forms will be reviewed by the CEO to determine whether there is a conflict of interest.
- 4.7. Several factors may need to be considered when assessing the seriousness and impact of the conflict of interest and potential for bias. These include but are not limited to:
 - a) The seriousness of the actual, potential or perceived conflict.
 - b) How closely the declared interests and the Edit Education's interests are related to each other.
 - c) The extent to which the individual's other interest could affect or be perceived to affect Edit Education's decisions or activity.
 - d) The nature or extent of the individual's current or intended involvement in Edit Education's decision making or activity.
- 4.8. Where a Conflict of Interest is identified consideration will be given by the CEO as to managing that conflict. All conflicts of interest must be declared to the relevant Awarding Organisation.

5. Mitigating a conflict of interest

5.1. Where a conflict of interest is identified Edit Education will take steps to mitigate the effect of that conflict. The following are options to be considered:

- a) The conflict of interest is removed – for example by moving the responsibility for a process or assessment to another staff member.
- b) The staff member voluntarily removing themselves from the issue that causes the conflict.
- c) Applying additional scrutiny and controls where an assessor has a personal interest in the outcome of a student assessment.
- d) An independent Internal Quality Assurer (IQA) is employed where the usual IQA undertakes assessment activity.
- e) Staff members seeking to pursue qualifications and assessments offered by Edit Education are registered and assessed at another Centre.
- f) Not allowing individuals to participate in any discussions/decisions relating to the conflict of interest and requiring them to leave the meeting when the item is discussed.
- g) Contracts that include information on other roles or responsibilities the individual is not permitted to carry out whilst engaged by the contracting organisation.