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## **Conflict of Interest Policy**

### **Purpose**

This policy outlines LEC's intention to identify and monitor all potential or actual conflicts of interest that may affect the delivery and/or assessment of our qualifications now or in the foreseeable future, it has also been designed to support our centres to identify potential or actual cases of conflict of interest and how to appropriately manage them.

To reduce the risk of a conflict of interest happening we record possible cases that have been identified to date and any arrangements that are in place to prevent them from occurring.

LEC are required to adhere to the general conditions of recognition, from time to time we may be required to provide our regulators with evidence that we are complying with their requirements in relation to conflicts of interests, and to prevent such conflict having an adverse effect on our qualifications.

### **Definition of Conflict of Interest**

For the purpose of this policy, we have adopted the definition used by the regulatory authorities regarding conflicts of interest.

A conflict of interest exists in relation to LEC in the following way:

- It's interests in any activity undertaken by it, on its behalf, or by a member of staff which 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 LEC has interests in any other activity which have the potential to lead that person to act contrary to their interests in that development, delivery or award and impact on our compliance with the requirements set out by the regulator's conditions of recognition
- An informed and reasonable observer would conclude that either of these situations was the case.

### **Definition of an Adverse Effect**

For the purpose of this policy, we have adopted the definition used by the regulatory authorities regarding an adverse effect:

An act, omission, event, incident or circumstance has an adverse effect if it:

- Gives rise to prejudice to learners or potential learners, or adversely affects
- Adversely affects the ability of LEC to undertake the development, delivery or award of qualifications in accordance with its conditions of recognition.

- Adversely affects the standards of qualifications that LEC makes available or proposes to make available, or public confidence in LEC qualifications.

## **Policy**

A conflict of interest is where an individual or organisation has competing interests or loyalties. Conflicts of interest may occur in a variety of circumstances, and it is possible that people working alongside and/or for LEC.

### **Examples of Conflicts of Interest**

It is not possible to provide a definitive list of examples of conflicts of interest that could compromise the integrity of LEC assessments and qualifications. However, the following situations could lead to perceived or actual conflicts of interest:

- Personal relationships with family members or friends linked to LEC and/or centre personnel and/or learners that could influence decision-making and qualification outcomes
- Business or commercial interests linked to LEC and/or a centre that may affect professional judgement
- Mutually beneficial arrangements with centre and LEC personnel which may compromise an individual's ability to make reliable and professional judgements
- Where favourable arrangements have been negotiated, for example supplying information to certain individuals and/or groups who are preparing for or carrying out an assessment
- A person connected with LEC or a centre who are engaging in some capacity or have a material financial interest in a business or enterprise that compete with LEC.
- A centre has an interest in any activity which has the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications in accordance with the conditions of the centre.
- A situation that may create the appearance of a conflict, or present a conflict of interest in connection with a person who has influence over the activities or finances of LEC.

The existence of such interests, as those above does not necessarily imply conflict, but is likely to give an appearance of conflict and as such should be declared to LEC Centre Manager.

### **Conflict of Interest Principles**

LEC staff are obliged to abide by the following principles when identifying and managing potential and/or actual conflicts of interest:

- All management and staff must commit to identifying and managing all potential and/or actual conflicts of interest that may affect LEC, and in doing so must report these cases to the quality assurance manager.
- All staff must be proactive in identifying and managing cases of conflicts of interest that may affect LEC effectiveness, compliance with regulatory requirements and/or our reputation.

- Staff must be open about any cases of potential and/or actual conflicts of interest and not withhold any information or try to present them in a better light (managing conflicts of interest is about preventing cases from occurring that may have an impact on the operational effectiveness and regulatory compliance at LEC)
- Must strive to identify and deal with conflicts of interest as soon as they are identified
- The control for the management of conflicts of interest must be proportionate to the risks associated with the identified cases.

### **Responsibility to Register a Conflict of Interest**

All individuals that this policy applies to have a responsibility to report potential and/or actual cases of conflict of interest and should use the LEC conflict of interest disclosure form.

### **Centre Responsibility**

LEC centres must comply with this conflict-of-interest policy and ensure ongoing compliance with the following:

- Take steps to avoid or reduce any existing or potential conflicts of interest Centres must consider how they should manage working arrangements to avoid potential conflicts of interest. For example, a member of staff at the centre undergoing an assessment must be assessed by an unrelated assessor.
- Complete and submit a copy of the conflict-of-interest disclosure form to LEC and retain a copy for the centre records. All sections on the form must be completed providing as much information as possible, ensure the form includes a signature and date.
- Maintain up to date records of all conflict of interest. Centres must maintain accurate records of all existing and/or potential conflicts of interests, details of all mitigating actions must be included.
- Update records with any changes in circumstances and notify LEC of any changes.

Centres must notify LEC of any changes to circumstances relating to any previously declared conflicts of interest and must submit any changes which may lead to new or potential conflicts of interest.

- Inspect activities and assessments where there is a conflict of interest that cannot be avoided. Centres must carry out additional quality assurance monitoring activities in cases where conflicts of interest are unavoidable.

Examples:

- Personal or professional relationship between IQA's, assessors, trainers and learners (including family members that are part of LEC's team).
- All personnel undertaking mandatory regulated qualifications within their own centre
- Instances of mutual quality assurance activities between IQA's.

### **Procedures for Dealing with Conflicts of Interest**

Where any member of personnel at a centre believes there has been a breach of this policy, or if any unforeseen conflicts of interest arise, the compliance manager must be notified, and an investigation should be carried out immediately.

The process for the above is as follows:

- The conflict-of-interest disclosure form must be completed providing as much information as possible, ensuring all sections of the form are complete.
- A conflict-of-interest disclosure form must be completed by all personnel on commencement with a centre declaring any conflict of interest; the form is to be completed even when there are no conflicts of interest to declare. The form should be forwarded to LEC which will then be held on our database.
- If an individual has any changes to their declared circumstances, they must notify the centre coordinator immediately by completing the conflict-of-interest disclosure form, the new information should be evaluated, dealt with accordingly and the centre file should be updated.

When all information relating to conflicts of interest are received at LEC they will be evaluated by the compliance manager to identify if any further action is required. A written report of the outcome will be held on the centre's records and communicated with the co-ordinator and the EQA.

Most situations will not require any further action other than the completion of the conflict-of-interest disclosure form, however by following this process LEC can ensure that any follow up action is appropriately managed.

We advise centre co-ordinators to retain original copies of all forms for their own records and submit copies to the centre manager at LEC.

If a breach of this policy is also classified as an adverse effect, then the quality assurance manager / compliance manager will inform the regulators in accordance with the procedures for dealing with an adverse effect. They will also inform the regulators of the reasonable steps that have been taken or propose steps to prevent, correct or mitigate the adverse effect.

Examples of actions that could mitigate the conflicts are as follows:

- Person(s) not taking part in the assessment or verification
- Referring decisions that affect the competence of learners to an independent person
- Agreeing not to be involved in a specific aspect of the centre's activities or processes
- Referring the matter to the compliance manager at LEC for advice and guidance.

### **Monitoring and Review**

This policy and its procedures will be reviewed regularly for improvements as part of our Quality Assurance requirements. This will ensure it is fit for purpose, reflects the services we deliver to our centres and that we are providing services which are relevant to the requirements of individual needs.

# Conflict of Interest Disclosure Form

**Full name:**

**Job role:**

**Centre name and reference:** London Electrical College (C001782)

**Contact Number:**

**Centre Manager:** Ardita Zeka

**Centre address:** North Finchley Library, Ravensdale Avenue, N12 9HP

**Centre telephone number:** 020 3343 6331

**Centre email:** info@londonelectricalcollege.com

I have no conflict of interest to report

I have the following conflict of interest to report:

Information for declaration must include the following:

- The type of interest
- The nature of the interest
- A description of all personnel involved in the interest, financial or non-financial and/or any other relevant information (e.g name of learner).

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between LEC and your personal interests, financial or otherwise:

Please refer to the Conflict of Interest Policy for more information.

Declaration LEC- Conflict of Interest Policy

I acknowledge that the above interests exist and to the best of my knowledge I have informed LEC with all the relevant information relating to the conflict of interest.

Review by LEC Centre Manager (if applicable):

Action to be taken to minimise Conflict of Interest:

Signed:.....

Date:.....