Conflict of Interest Policy and Procedure

Purpose:

The purpose of this policy is to identify, manage, and mitigate any actual, potential, or perceived conflicts of interest that may arise in the course of Empowering Futures' operations. This includes all activities related to the delivery, assessment, internal verification, and administration of qualifications. The policy aims to maintain integrity, impartiality, and public trust in our processes and outcomes.

Scope:

This policy applies to all staff members, freelance tutors, assessors, internal verifiers, governors, contractors, learners, and external stakeholders involved in any Empowering Futures programmes. It covers all funded and non-funded provision, including alternative provision for young people, adult education, teacher training, and private tuition services.

Definition:

A conflict of interest is any situation in which an individual's personal interests, relationships, or financial considerations may compromise or appear to compromise their professional judgment, actions, or responsibilities. This includes but is not limited to:
- Assessing a learner to whom the assessor is related or has a close personal relationship.
- Making decisions that could benefit the individual financially or professionally outside of their official role.
- Holding interests in a third-party organisation that may compete or collaborate with Empowering Futures.

Policy Statement:

Empowering Futures is committed to conducting all operations with transparency and integrity. All conflicts of interest—whether actual, potential, or perceived—must be declared and appropriately managed. We take proactive steps to prevent conflicts from affecting qualification delivery, learner assessment, and organisational decision-making.

Roles and Responsibilities:

- All staff must take personal responsibility for identifying and declaring conflicts of interest.
- Line Managers must support staff in resolving or mitigating conflicts.
- The Quality Assurance Lead oversees conflict of interest records and implements actions as needed.
- The Senior Leadership Team reviews high-risk cases and ensures compliance with awarding body guidance.

Procedures for Declaration and Management:

1. Declaration of Interest:
- On appointment, staff must complete a Conflict of Interest Disclosure Form outlining any existing conflicts.
- Staff must declare new or emerging conflicts immediately to their line manager and the Quality Lead.
2. Assessment and Review:
- The Quality Lead will assess the potential impact of the conflict and determine appropriate actions, which may include:
  - Reassignment of duties.
  - Independent verification of decisions.
  - Removal from specific assessment or delivery activities.

- Any significant conflict will be referred to the Senior Leadership Team for resolution.
3. Record Keeping:
- All declared conflicts and actions taken will be recorded in a Conflict of Interest Register maintained by the Quality Team.
- Records are retained securely for at least three years and reviewed annually.
4. Examples of Action Taken:
- If a tutor is related to a learner, another assessor will be assigned.
- If a staff member holds a financial interest in a partner organisation, they will be excluded from procurement or quality assurance decisions relating to that entity.
5. Non-Compliance:
- Failure to declare a conflict of interest may result in disciplinary action in line with HR policy.
- Malpractice linked to undeclared conflicts may be reported to the awarding organisation.
6. Awareness and Training:
- All staff receive training on this policy as part of their induction and refresher training.
- The policy is published on the internal staff portal and included in staff handbooks.

Monitoring and Review:

The Conflict of Interest Policy is reviewed annually by the Quality Assurance Lead and the Senior Management Team. Updates are made in response to operational needs, regulatory changes, or findings from audits and reviews.

Approval and Review:

Issue Date: 22 May 2025

Next Review Date: 22 May 2026