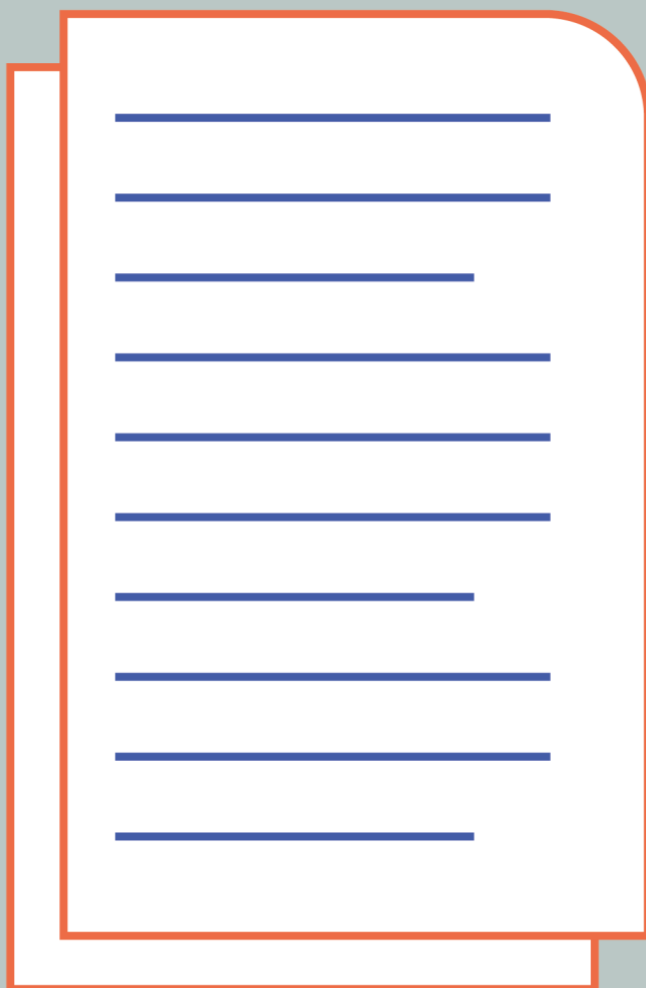


Conflict of Interest Policy



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INTRODUCTION

Certify Training Qualifications Ltd (CTQ) is committed to ensuring that all its activities, policies and procedures are free from bias. The purpose of this policy is to protect the integrity of CTQ assessments, qualifications and its business.

As a regulated awarding organisation, CTQ is required to have a Conflict of Interest policy in place that allows it to identify, manage and mitigate conflicts of interest. The policy provides members of staff and those contracted to work for CTQ and those that interact with it as an awarding organisation with information that must be considered when performing their duties.

It extends to any individual, organisation undertaking any activity on behalf of the awarding organisation and any person acting on behalf of CTQ through a third-party arrangement under Ofqual Conditions C1 or C2 to ensure that its activities are fair, valid and carried out in line with our processes.

This policy covers how CTQ will identify conflicts of interest, or potential conflicts of interest, within the awarding organisation and how and these will be managed and mitigated.

POLICY STATEMENT

The purpose of this policy is to protect CTQ's integrity as an organisation and its qualifications. It recognises that conflicts of interest may occur and sets out guidance that must be followed to ensure that a conflict of interest, or potential conflict of interest does not have an adverse effect on the development of a qualification, the assessment process or the assessment outcomes.

A conflicts of interest policy is required by all organisations to ensure good governance and in the case of CTQ it needs to demonstrate that it can specifically control the potential conflicts of interest identified.

Potential conflicts include both conflicts of interest which relate to CTQ and any scenario in which it is reasonably foreseeable that any such conflict of interest will arise in the future.

Conflicts of interests may arise where an individual's commercial, personal or family interests and/or loyalties conflict with those of CTQ and its Learners. Such conflicts may create problems; they can for example:

- Inhibit free discussion
- Result in decisions or actions that are not in the interests of CTQ and its Learners; and
- Risk the impression that CTQ has acted improperly

DEFINITION

A conflict of interest is a situation in which an individual, or organisation, has opposing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

For the purposes of this policy 'Conflict of Interest' is defined as any situation that exists where;

- Its interest in any activity, or activity undertaken on its behalf, has the potential to lead it to act contrary to the Conditions of Recognition in relation to the development, delivery and issuing of results of qualifications
- A person who is connected to the development, delivery or issuing of results for qualifications on behalf of the awarding organisation has interests in any other activity which could potentially conflict with its interests in the development, delivery or issue of results in accordance with the regulatory requirements, or
- An informed and reasonable observer would conclude that either of these situations was the case

Conflicts of interest can arise in a variety of circumstances relating to awarding organisation activity, for example:

- where someone has a position of authority in one organisation which conflicts with their interests in another organisation
- where someone has personal interests that conflict with their professional position (e.g., Where a member of the CTQ Governing Board or member of staff has a professional interest in a CTQ approved Centre)
- Where a member of the CTQ Governing Board or member of staff has a professional interest in an CTQ approved Centre
- where someone works for CTQ or carries out work on our behalf, but who may have paid or unpaid personal interests in another business which uses CTQ products or services or produces similar products (e.g., where an individual is externally marking assessments for CTQ and works for a Centre that delivers CTQ qualifications)
- where someone works for or carries out work on our behalf who has friends or relatives taking CTQ assessments
- where there is a conflict between income and regulatory responsibilities
- Assessment activity, or activity undertaken on its behalf, has the potential to lead it to act contrary to Ofqual's Conditions of Recognition
- when CTQ creates and follows a procedure that conflicts with its regulatory responsibilities as an Awarding Organisation
- A marker is marking assessments of a Centre in which a close family member has a financial interest
- A CTQ staff member or contractor assesses a learner who is their relative or friend
- Anyone who has access to confidential assessment material for a qualification that delivers external training on that qualification

- An individual involved in that may be working for an organisation that is in direct competition with the organisation involved in on programme delivery
- When there are no clear parameters between the development of assessment papers and materials and administration of tests for example where an employer supports CTQ as a sector expert with the development of such assessments

CONFLICTS OF INTEREST REGISTER

CTQ maintains a Conflicts of Interest Register to record all potential and actual areas of conflict across the business.

Each conflict's impact and probability are considered and relevant mitigating actions are implemented to ensure such conflicts are managed appropriately and within specified timescales.

The Register is reviewed monthly by the Leadership Team and quarterly by the Governing Board.

All Governing Board members and senior officer declarations are included on a separate Conflicts of Interest Register that records all Board members potential and actual areas of conflict which is maintained by the Board Secretariat and reviewed at each Board meeting.

The information included on each Register will be processed in accordance with data protection principles as set out in the Data Protection Act 2018. Data will be processed only to ensure that staff act in the best interests of CTQ. The information provided will not be used for any other purpose.

IDENTIFYING CONFLICTS OF INTEREST

If a stakeholder of CTQ, including employees, consultants, assessors, approved Centres or a member of an CTQ committee or Board, has any direct or indirect, actual or potential conflict of interest or relationship with any individual or organisation this must be declared so that it can take action to remove or manage the conflict where appropriate. If this is not possible, the relationship with the party/parties concerned may have to be terminated.

Where a potential conflict of interest is identified by CTQ, steps will be taken to ensure that the conflict is removed, or managed to its satisfaction. If this is not possible, the relationship with the party/parties concerned may have to be terminated.

All individuals regardless of their role that are acting on CTQ's behalf are required to complete a Conflict of Interest Declaration Form on commencement of their relationship with CTQ and annually thereafter. If there is any doubt whether or not something represents a conflict of interest, it must be reported.

Individual team members and managers, members of CTQ Committees, Groups or Teams and the Governing Board are expected to proactively inform the Responsible Officer immediately of any actual or potential conflicts of interest that could adversely influence their judgement and objectivity and impact the awarding organisation. The Responsible Officer is responsible for ensuring that all issues reported internally or by a third party are investigated, dealt with appropriately and escalated internally or to the Governing Board when necessary.

If the status of any identified conflict changes or the controls put in place to mitigate the conflict change, this must be reported immediately to the Responsible Officer.

Where a conflict of interest has not been previously identified as described above, and only becomes apparent after the event CTQ will act to identify any adverse effect arising from the conflict and take all reasonable steps to mitigate the adverse effect as far as possible and correct it.

SPECIFIC TO CTQ APPROVED CENTRES

As part of the centre approval process, all CTQ Centres are required to have in place a conflict of interest policy which is subject to review as part of the quality assurance arrangements in place for monitoring of Centres.

Approved Centres have contractual obligations to identify and monitor:

- All conflicts of interest which relate to their work in delivering qualifications, and
- Any scenario in which it is reasonably foreseeable that any such conflict of interest will arise in the future

The following are examples of potential conflicts of interest that could be relevant in an CTQ Approved Centre but is not exhaustive:

- A director, partner or staff member of an CTQ Approved Centre participates in a private professional activity, consultancy or secondary employment that conflicts or may conflict with the carrying out of his or her official duties for that Centre
- Where an individual, participates in, or has the ability to influence decisions affecting another person with whom the employee has a family or personal relationship
- A Centre incentivises its staff by offering a bonus for the number of learners achieving a 'pass'
- A Centre offers learners a 'Guaranteed Pass' scheme, or a money-back guarantee scheme, which could compromise the integrity of the assessment and the result awarding process
- A consultant or employee of CTQ who has been involved in the development of assessment materials or other confidential materials related to assessment begins employment at a CTQ Approved Centre and delivers training and/or assessment having had prior knowledge of assessment content
- Members of staff at a CTQ Approved Centre have been directly involved in the development of an assessment and its associated assessment materials or

resources designed to support the preparation of learners for assessments/qualifications awarded by CTQ

For the avoidance of doubt, all reasonable steps should be taken by a Centre to prevent any part of a learner's assessment being undertaken by an individual (s) (including invigilation of an assessment) that may have a personal interest in the outcome of the assessment.

Every Approved Centre appoints a Head of Centre to act as the single point of accountability for adhering to all CTQ policies, procedures and regulations as required as part of the Centre Approval process. The Head of Centre is responsible for ensuring that all Centre staff, whether directly or indirectly employed by the Centre (including all consultants and contractors) are aware of this policy and the responsibilities covered therein.

Where there is a perceived potential or actual conflict of interest, individual Centre staff members are required to inform the Head of Centre, who will document and resolve the issue or escalate it to CTQ's Head of Quality. This includes where an individual undertakes additional employment, whether paid or voluntary, outside their employment with the Centre.

Any declared interests, whether perceived, potential or actual will be recorded on the CTQ Register.

RESPONSIBILITIES

Awarding Organisation Governing Board

The Board is responsible for ensuring the Awarding Organisations continued regulatory compliance including adherence to agreed policies.

The Board is responsible for the management of conflicts of interest that are escalated to them as risks to CTQ.

Board members are required to declare any business or other interests in any item being discussed at a meeting. Each board member must disclose their interest, withdraw from the meeting and not vote on an item if:

- There may be a conflict between their interests and the interests of the Board
- There is reasonable doubt about their ability to act impartially in relation to a matter where a fair hearing is required
- They have a personal interest in a matter where they and/or a close relative will be directly affected by the decision of the Board in relation to that matter

Responsible Officer

The Responsible Officer is responsible for initially assessing the impact of a conflict of interest and any action already taken to ensure that there is no adverse effect.

He/she is responsible for coordinating a response to any potential or actual conflict of interest raised by others and recommending action if an adverse effect is notified to CTQ.

Where possible the conflict will be removed but if it cannot, the Responsible Officer will liaise with the Head of Quality to consider any necessary actions and controls that need to be put in place to manage and mitigate any impact on the awarding organisation and ensure that learners are not adversely affected.

He/she is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the organisation and, when necessary, to the Board and the regulatory authorities.

If a conflict relates to a Board member the matter will be investigated by the Non-Executive Director that is not involved in the conflict who will agree the appropriate actions to manage or remove the conflict of interest with the Chair of the Governing Board. Where the conflict relates to the Chair of the Governing Board the Non-Executive Director would agree such actions with the Responsible Officer.

If the conflict relates to the Responsible Officer the matter will be investigated by a Non-Executive Director who will agree the appropriate actions to manage or remove the conflict of interest with the Chair of the Governing Board.

In those circumstances an extraordinary Governing Board meeting will be convened by the Responsible Officer (non-executive director if the conflict relates to the Responsible Officer) to discuss the necessary actions and controls that need to be put in place to manage and mitigate any impact on the awarding organisation to ensure that learners are not adversely affected.

The Responsible Officer is responsible for ensuring the conflict of interest register is maintained and reviewed by the Leadership Team and by the Board.

Head of Quality

The Head of Quality is responsible for communicating and providing training where applicable on the Conflict of Interest Policy to all individuals across the business at least annually. He/she is responsible for ensuring contractual arrangements are in place and reviewed on an ongoing basis to make sure that the third-party arrangements are managed in terms of conflict including qualification and assessment developers and that EQA's notify CTQ of potential and actual conflicts of interest.

The role is responsible for:

- ensuring that procedures are reviewed annually to ensure that staff and contractors anticipate and manage potential or actual conflicts of interest
- ensuring that all new staff involved in activity with potential or actual conflicts of interest receives training
- including any new conflicts identified (on appointment, from the annual declaration and added as part of a rolling review) on the Conflicts of Interest register and notifying the Responsible Officer within 24 hours (maximum) so

that a response can be coordinated and the information made available to anyone allocating work to the individual

The role is responsible for ensuring that all members involved in activity with potential or actual conflicts of interest receives training.

Individual responsibility

All individuals involved in Awarding Organisation activities must be made aware of this policy as part of their induction and on-going training by the Head of Quality. The individual is responsible for ensuring that they are fully conversant with the policy and abide by the content.

All individuals are responsible for proactively disclosing any activity that might give rise to a potential or actual conflict of interest either to their line manager or directly to the Head of Quality within 24 hours (maximum).

Policy Review

This policy is reviewed as part of CTQ's continuous improvement monitoring through its annual self-assessment arrangements. It may be reviewed earlier should any feedback or concern be brought to the attention of CTQ to ensure it remains fit for purpose and the process and its outcomes are deliverable.

CTQ CONFLICT OF INTEREST DECLARATION FORM

Please set out your interests below in accordance with CTQ's Conflict of Interest Policy.

Category of interest	Details of the interest	Does this interest apply to yourself or a member of your immediate family, connected persons or some other close personal connection? Please state name of individual(s) if interest refers to someone other than you
Employment - current employment and any previous employment in which you continue to have a financial interest.		
Appointments - voluntary e.g., trusteeships, directorships.		
Appointments - remunerated e.g., paid trusteeships, directorships.		
Memberships - of any professional bodies, special interest groups or mutual support organisations.		
Investments - in unlisted companies, partnerships and other form of business, major shareholdings (e.g., more than 1%) and beneficial interests.		
Gifts or hospitality - offered to you by external bodies whether this was declined or accepted in the last 12 months.		
Any association with CTQ approved centres.		
Involvement with any other Awarding Organisation.		
Any involvement with an approved training provider, under another Awarding Organisation/end point assessment or otherwise.		
Any other conflicts not covered by the above.		

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis. I give consent for it to be used for the purposes described in the CTQ Conflict of Interest Policy and no other purpose.

Name: _____

Signed: _____ Date: _____