

External Conflict of Interest Policy



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VERSION CONTROL

Version number	Summary of change	Date changed
V1	Policy creation	December 2024
V2	New policy template, review and update to process	June 2025

INTRODUCTION

Certify Training Qualifications Ltd (CTQ) is committed to maintaining the highest standards of integrity and fairness across all its activities. This Conflict of Interest (COI) policy protects the impartiality of CTQ's qualifications, assessments, and business operations.

As a regulated awarding organisation, CTQ must identify, manage, and mitigate conflicts of interest to ensure fairness, validity, and transparency throughout all processes.

This policy applies to all individuals and organisations acting on behalf of CTQ, including employees, contractors, third-party partners, and approved centres, in line with Ofqual Conditions C1 and C2.

SCOPE

This policy covers actual, potential, or perceived conflicts of interest that could affect CTQ's qualifications development, assessment, or awarding activities.

It applies to:

- All CTQ staff, contractors, and associates
- Members of the CTQ Governing Board and committees
- Approved centres delivering CTQ qualifications
- Any third parties acting on CTQ's behalf

The policy defines conflicts of interest as situations where personal, commercial, or family interests could compromise or appear to compromise the objectivity, fairness, or regulatory compliance of CTQ activities.

ACTIVITY

CTQ recognises that conflicts of interest can arise in many forms and at different stages of its awarding organisation activities. The effective identification and management of these conflicts is critical to preserving the integrity, fairness, and regulatory compliance of our qualifications and services.

ANTICIPATING AND PLANNING FOR FORESEEABLE CONFLICTS

CTQ takes proactive steps to identify and plan for scenarios where conflicts of interest are reasonably foreseeable, even if they have not yet arisen.

These scenarios may relate to recurring risks, known relationships, dual roles, or structural overlaps between CTQ and its centres, contractors, or partners.

To support this, CTQ has developed a set of example conflict scenarios and planned mitigations, which are included as Appendix 1: Foreseeable Conflict Scenarios.

This appendix is reviewed annually by the Head of Quality and updated where necessary, ensuring that CTQ's conflict planning remains relevant and effective.

IDENTIFYING CONFLICTS OF INTEREST

All individuals involved with CTQ whether employees, contractors, members of the Governing Board, approved Centres, or third-party associates are required to actively identify and disclose any actual, potential, or perceived conflicts of interest. This obligation begins at the outset of their engagement with CTQ and continues throughout their relationship.

Declarations must be made on appointment and updated at least annually through a formal Conflict of Interest Declaration Form. However, if any new conflict arises or circumstances change during the course of work, this must be reported immediately without delay.

If there is any uncertainty about whether a situation represents a conflict, individuals must err on the side of transparency and disclose it to their line manager or the Head of Quality and Operations. Failure to disclose a conflict of interest may lead to termination of contracts or other disciplinary measures, as undisclosed conflicts risk compromising the integrity of CTQ's activities.

REGISTERING, ASSESSING, AND MANAGING CONFLICTS OF INTEREST

When a conflict of interest is disclosed or identified, CTQ follows a structured process to ensure it is managed effectively and transparently. This process protects the integrity of CTQ's qualifications and operations while complying with regulatory requirements:

Step 1: Recording the Conflict

All declared conflicts of interest are logged on the CTQ Conflicts of Interest Register. This register records the nature of the conflict, the individual involved, and any relevant contextual information.

Step 2: Initial Assessment

CTQs Head of Quality and Operations (if the conflict relates to CTQ's Head of Quality and Operations, another suitable member will be appointed to carry out the assessment) reviews each conflict to assess its likelihood and potential impact on CTQ's impartiality, qualification validity, and learner outcomes. This assessment considers both actual and perceived risks.

Step 3: Determining Actions

Based on the assessment, CTQ will recommend appropriate mitigating actions to ensure that the conflict does not result in an Adverse Effect. These may include:

- Reassigning duties to avoid involvement in conflicted decisions
- Restricting access to confidential information
- Monitoring activities closely to prevent undue influence
- Implementing additional controls as necessary

Step 4: Implementation of Controls

The Head of Quality and Operations ensures that agreed mitigating actions are promptly implemented. The individual involved is informed of any restrictions or changes in responsibilities.

Where a declared or potential conflict relates to the investigation of suspected malpractice or maladministration, CTQ will ensure compliance with Condition A8.3 by excluding any individual with a personal interest from involvement in the investigation or decision-making process.

These conflicts will be assessed and recorded in the same way as other types of conflict but may also trigger additional oversight through CTQ's Malpractice and Maladministration Policy.

Step 5: Ongoing Monitoring and Review

The Conflicts of Interest Register is reviewed monthly by the Leadership Team to confirm that controls remain effective and relevant. The Governing Board receives quarterly reports for oversight and strategic review.

Step 6: Escalation (if required)

If a conflict presents an unmanageable risk or if mitigation fails, the issue is escalated to the Governing Board for decision. This may include reconsidering relationships, imposing stricter controls, or terminating contracts to protect CTQ's interests.

This process ensures that conflicts are dealt with consistently, transparently, and proportionately, preserving confidence in CTQ's operations and safeguarding learners.

HANDLING UNDISCLOSED OR LATE-DISCOVERED CONFLICTS

In some cases, conflicts may only become apparent after decisions or activities have taken place. In such instances, CTQ undertakes a thorough investigation to identify any adverse effects on the awarding organisation or learners.

Reasonable steps will then be taken to correct or mitigate the impact, including reassessment of affected learners where necessary, and revising internal processes to prevent recurrence.

CTQ is committed to transparency and remedial action, even where conflicts were initially undisclosed.

ROLES AND RESPONSIBILITIES

The following RACI matrix outlines the roles and responsibilities for key activities within this policy, ensuring clarity on who is Responsible, Accountable, Consulted, and Informed.

Activity	Responsible	Accountable	Consulted	Informed
Conflict of Interest Declaration Submission	Individual Staff / Contractor / Board Member	Head of Quality and Operations	Responsible Officer	Responsible Officer
Initial Review and Risk Assessment of Conflict	Head of Quality and Operations	Head of Quality and Operations	Responsible Officer	Individual Involved

Determination of Mitigating Actions	Head of Quality and Operations	Head of Quality and Operations	Responsible Officer	Individual Involved
Implementation of Controls and Monitoring	Head of Quality and Operations	Head of Quality and Operations	Responsible Officer / Line Manager	Individual Involved
Register Maintenance and Regular Review	Head of Quality and Operations	Head of Quality and Operations	Leadership Team / Responsible Officer	Governing Board
Escalation of Unmanageable Conflicts	Responsible Officer	Governing Board	Non-Executive Directors	Leadership Team / Individual Involved
Reporting to Regulatory Authorities (e.g., Ofqual)	Responsible Officer	Head of Quality and Operations	Governing Board	Relevant Internal Teams
Communication and Training on COI Policy	Head of Quality and Operations	Head of Quality and Operations	Responsible Officer	All Staff and Contractors

ESCALATION AND REPORTING

CTQ takes the management of conflicts of interest seriously and has clear escalation routes to ensure timely and appropriate resolution.

If a conflict cannot be resolved satisfactorily at the operational level, or if it poses significant risks to CTQ's impartiality or regulatory compliance, the matter is escalated to the Responsible Officer. Where the Responsible Officer is involved, escalation proceeds to the Governing Board, supported by Non-Executive Directors to ensure independent oversight.

Board members must declare any personal or business interests that relate to agenda items and, where conflicts exist, must withdraw from discussion and decision-making to maintain integrity.

In cases where conflicts potentially affect learner outcomes or regulatory compliance, CTQ will report the matter to the relevant regulatory authorities in accordance with its obligations. This includes timely notification to Ofqual when required.

Approved centres' conflicts of interest are monitored through quality assurance activities. Should CTQ identify issues that centres fail to manage adequately, these will be escalated internally and, if necessary, may impact centre approval status.

Regular reporting on conflict management is provided to the Governing Board, including summaries from the Conflicts of Interest Register, actions taken, and any lessons learned to strengthen CTQ's controls.

Persistent non-compliance or deliberate breaches of this policy will be subject to disciplinary or contractual sanctions, which may include termination of employment or contracts.

CONFLICT OF INTEREST REVIEW AND REPORTING

All conflicts of interest declared or identified within CTQ are logged systematically and reviewed quarterly to detect recurring patterns, potential risks to quality, and opportunities for improvement. This ongoing review supports CTQ's commitment to regulatory compliance and continuous organisational learning.

We evaluate the nature, frequency, and outcomes of conflicts to determine whether they reveal weaknesses in processes or controls, or present risks that could adversely affect the integrity of our qualifications and assessments.

Where necessary, the insights gained from conflict management inform updates to policies, procedures, staff training, and quality assurance measures. CTQ is committed to taking proportionate and preventative action to reduce the likelihood of conflicts recurring and to maintain the trustworthiness of its awarding activities.

Summary data is reported to the Senior Leadership Team and reviewed alongside other quality assurance indicators. Where issues are serious or recurring, they may be escalated to the Board for governance oversight.

POLICY REVIEW

This policy is subject to a three-year review cycle, or earlier if feedback or concerns are raised with CTQ, to ensure it remains fit for purpose and its processes and outcomes are deliverable.

It will also be reviewed as part of CTQ's continuous improvement monitoring through its annual self-assessment arrangements.

REGULATORY CONDITIONS AND REQUIREMENTS

CTQ is committed to meeting the requirements set out by Ofqual's Conditions of Recognition.

CTQ will ensure:

- Policies and procedures align with regulatory conditions.
- All staff understand their obligations in relation to compliance.
- A robust system is in place to identify, manage, and mitigate risks to regulatory compliance.

The table below lists the conditions to which this policy applies.

Condition reference							
A4.1	A4.2	A4.3	A4.4	A4.5	A4.6	A4.7	A4.8
A8.3	A6.2						

APPENDIX 1 – FORESEEABLE CONFLICT SCENARIOS

The below table shows foreseeable conflict scenarios, this table is not exhaustive and will be kept under review to ensure any new currently unknown conflicts are added to this policy.

Scenario	Risk Description	Likelihood	Planned Mitigations	Reportable to CTQ?
CTQ associate also works for a CTQ-approved centre	Potential for bias in centre monitoring or moderation decisions	Medium	All dual roles declared; individual excluded from quality assurance of own centre	Yes
Assessment writer is also delivering the qualification	Risk of insider advantage, undue access to assessment materials	High	Writer not permitted to assess/deliver; materials peer-reviewed independently	Yes
Personal relationship between centre staff and learners	Risk of preferential treatment or unfair advantage	Medium	Declaration required; learner allocated to different assessor/tutor	Yes
A Governing Board member has business interests with a centre	Risk of perceived influence on decisions	Low	Declaration logged; board member excluded from relevant decisions	Yes
External consultants involved in both qualification design and delivery	Potential for lack of separation in roles impacting validity	Medium	Role split; design work completed before any delivery; external review	Yes
Director or staff member holds conflicting positions across	Conflict of interest between responsibilities	High	Declaration required; exclusion from conflicted decisions	Yes

CTQ and another organisation	and loyalty to both entities			
Marker is marking assessments of a centre where a family member has financial interest	Risk of favourable treatment or bias	High	Reallocation of marking duties; not permitted to mark such assessments	Yes
Staff or contractors assessing learners who are relatives or friends	Risk of biased assessment	High	Not permitted; learner assigned to alternative assessor	Yes
Individuals with access to confidential assessment material deliver training on the same	Risk of unfair advantage or leaked material	High	Role separation required; non-disclosure agreement enforced	Yes
Assessment activity leads CTQ to act contrary to Ofqual Conditions	Regulatory non-compliance	Medium	Internal compliance review; alignment with Conditions of Recognition	Yes
Centre staff incentivised with pass-rate bonuses	Risk of grade inflation or compromised assessment integrity	Medium	Declared in centre agreement; monitored through quality assurance	Yes
Centre offering guaranteed pass or money-back guarantees	Potential compromise of assessment validity	High	Prohibited; monitored via marketing and QA visits	Yes
Consultant involved in assessment material joins centre and delivers training	Risk of prior knowledge compromising fairness	High	Cooling-off period enforced; not permitted to deliver on same qualifications	Yes

Conflict between income targets and regulatory responsibilities	Risk of commercial pressure overriding compliance	Medium	Strategic decisions reviewed through compliance lens; Board oversight	Yes
Lack of separation between assessment development and administration	Increased risk of bias or compromised integrity	Medium	Separate teams and review process enforced	Yes
Staff or associates with ties to competitors involved in programme delivery	Conflict due to competing interests or confidentiality breaches	Medium	Declared and reviewed; access to sensitive material restricted	Yes