



Conflict of Interest Policy

Version Reference: POL004-V23-1

Department: AO



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Version Control: POL004-V23-1

The following table presents the version control of this policy:

Version	Date	Reason for Change	Changes approved by:
POL004-V23-1	07/06/2023	New document template applied. Addition of wording from OfQual CoR and approved centre requirements.	SS

Please note: This version replaces all previous versions.

1. Introduction

FutureQuals (FQ) is committed to ensuring that all of its activities are free from bias. The purpose of this policy is to protect the integrity of our qualifications and our business.

The policy provides guidance to members of staff and those contracted to work on behalf of FutureQuals on how to handle possible and actual conflicts of interest that may arise because of our role as an awarding organisation.

The policy provides members of staff, approved centres, associates and those contracted to work for FutureQuals with information that must be considered when performing their duties and undertaking any activity on behalf of the awarding organisation, including the administration and delivery of FutureQuals Qualifications.

It sets out FutureQuals position on conflicts of interest, the procedures that are to be followed should conflicts be identified. It also outlines the approach FutureQuals takes in identifying, monitoring and evaluating actual and potential conflicts that may affect the awarding organisation now and in the future.

The scope of the policy extends to all FutureQuals staff, approved centres, including all those involved in the administration and delivery of FutureQuals qualifications, associates and any other individuals that interact or potentially interact with us as an awarding organisation. This includes individuals involved with any aspects of the design, development, award, delivery, marketing, sales or any other activity connected to FutureQuals qualifications and assessments.

2. Purpose

3. Links to other policies

This policy should be read in conjunction with the following policies and procedures:

- Malpractice Policy
- Sanctions Policy
- Assessment Principles

4. Links to Regulatory Criteria

Regulator	Regulatory rule or guidance document	Regulatory condition / principle
CCEA	General Conditions of Recognition	A4, A6, I1
Ofqual	General Conditions of Recognition	A4, A6, I1
Qualifications Wales	Standard Conditions of Recognition	A4, A6, I1
SQA Accreditation	Regulatory Principles (2021)	RP1, RP13

5. Definitions

The following is the definition provided in the OfQual Conditions of Recognition (A4)

In general terms, a conflict of interest exists when an organisation or an individual has competing interests, which might impair its or their ability to make objective, unbiased decisions. In the case of an individual, the conflict of interest could compromise or appear to compromise the ability to make unbiased decisions and/or judgements if not managed.

Conflicts of interest can arise in a variety of contexts. The Ofqual Conditions cover conflicts of interest that affect (or could affect) an awarding organisation's ability to develop, deliver and award regulated qualifications in a way that complies with its Conditions of Recognition. They define the term 'Conflict of Interest' as:

A Conflict of Interest exists in relation to an awarding organisation where –

(a) its interests in any activity undertaken by it, on its behalf, or by a member of its Group have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications in a way that complies with its Conditions of Recognition,

(b) a person who is connected to the development, delivery or award of qualifications by the awarding organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award in a way that complies with the awarding organisation's Conditions of Recognition, or

(c) an informed and reasonable observer would conclude that either of these situations was the case.

Examples are provided below, however this list is not exhaustive:

- an individual works for or carries out work (paid or unpaid) on behalf of another business which either uses products or services, or produces similar products, or is in direct competition with FutureQuals
- an individual is carrying out quality assurance activities for any centre where there is a personal interest
- a member of FutureQuals' Governing Body or member of staff has a professional interest in a FutureQuals' recognised Centre.
- assessment and internal quality assurance activity is undertaken at a Centre by the same person

- very specialist knowledge is required to conduct assessment and or IQA of a qualification and it is not possible to avoid a situation where either or both party have an interest in the result.
- an individual is internally or externally marking assessments for FutureQuals and works for a Centre who delivers qualifications belonging to FutureQuals.
- an individual is assessing or internally marking assessments of a learner who is a friend or relative and making decisions about the outcome of their qualification.

6. Responsibilities

All individuals including:

- FutureQuals staff,
- Approved centres, including all those involved in the administration and delivery of FutureQuals qualifications,
- Associates, for examples EQAs. IEPAs and IQAs and any other individuals that interact or potentially interact with FutureQuals as an awarding organisation.
- Individuals involved with any aspects of the design, development, award, delivery, marketing, sales or any other activity connected to FutureQuals qualifications and assessments.

Are responsible for disclosing any activity that might give rise to a potential or actual conflict of interest. If there is any doubt whether or not it represents a conflict of interest, it must be reported.

FutureQuals staff

Individual team members and managers, members of the Executive Committee and the Governing Body must complete the Conflict of Interest form when they identify any actual or potential conflicts of interest that could adversely influence their judgement and objectivity and impact the awarding organisation.

Approved Centres

Centre must have systems and checks in place to ensure that an assessment is not undertaken by anyone who has a personal interest in the result of the assessment. Any potential or actual conflicts identified by the centre or by a member of FutureQuals external quality assurance team, must be reported to the FQ AO Operations immediately.

Individuals including those involved in the administration and delivery of FutureQuals qualifications, whether directly employed by the centre or contractors, are expected to inform FutureQuals AO Operations Team immediately of any actual or potential conflicts of interest that could adversely influence their judgement and objectivity and impact the awarding organisation and/or learners. Where an approved FutureQuals centre supplies delivery or other workforce to another approved FutureQuals centre they are also responsible for reporting any actual or potential conflict of interest to FutureQuals.

A potential or actual conflict of interest can be reported to FutureQuals by email or by completing the Conflict of Interest form on the FutureQuals website.

Head of Awarding Organisation Operations (Or equivalent)

The Head of Awarding Organisation Operations is responsible for ensuring that all issues reported by centres, associates or by a third party are investigated, that the individual circumstances of each

conflict are considered and the potential for influencing judgement and objectivity and impact the safe awarding of certificates is assessed and appropriate action taken.

Responsible Officer

The Responsible Officer is responsible for ensuring that all issues reported internally or by a third party are investigated, that the individual circumstances of each conflict are considered, the potential for influencing the activities of the awarding organisation are dealt with appropriately and escalated internally or to the Governing Body when necessary.

Governing Body

If the conflict relates to the Responsible Officer, the Chair of the Governing Body and Managing Director (MD) will investigate and agree the appropriate actions to manage or remove the conflict of interest.

7. Policy

Identification of potential conflicts of interest

FutureQuals recognises that individuals may take part in legitimate financial, business, charitable or other activities outside their FutureQuals role.

FutureQuals will complete due diligence checks to assist the identification and verification of information at any time that may involve the use of external business information providers. This is to ensure that we have taken all reasonable precautions to identify and deal with potential and actual conflicts and protect the interests of the business, customers and learners.

FutureQuals maintains a register of conflicts of interest where all actual and potential conflicts of interest are recorded. The register includes any action taken to remove or mitigate the conflict of interest, where appropriate. If there is any change to any identified conflict changes or the controls put in place to mitigate the conflict, the change must be reported immediately to the relevant FQ Head of Department.

8. Process

Managing conflict of interest

When a conflict of interest is identified within FutureQuals, or is identified within a Future Quals centre, the following process will be followed:

- The Head of AO Operations or Responsible Officer conducts an initial assessment of the impact of the conflict of interest and any action already taken to ensure that there is no adverse effect
- Remove the conflict where possible, or
- If the conflict cannot be removed and requires management, the Head of AO Operations or Responsible Officer will confirm 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 centre and Head of Centre and any workforce linked to the conflict or perceived conflict of interest will be informed of any decision or controls they are required to put in place in writing.
- Where a conflict of interest relates to a Centre, the AO Operations will include the details on the Centre Conflict of Interest register and these will be monitored by the AO Operations team. **The process for centres ends here.**
- The conflict will be recorded on the Conflict of Interest Register and reviewed by the Executive Committee monthly and quarterly by the Governing Body
- In the event of a conflict being declared or identified relating to the MD, the Chair of the Governing Body and Responsible Officer will investigate and agree the appropriate actions to manage or remove the conflict of interest
- In the event of a conflict being declared or identified related to a member of the Governing Body, the Managing Director will convene an Extraordinary Governing Body meeting 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

1. Monitoring and evaluation of the policy

The tools we use for implementing and monitoring policies, procedures and processes include regular meetings at operational and senior level. Each policy, procedure or process is assigned to a Head of Department who is responsible for its successful operation, addressing any issues arising from it and evaluating its effectiveness in meeting its purpose. This forms part of the controls that guide our business to ensure compliance with legislative and regulatory requirements.

Data required in support of a policy, procedure or process is held in line with the FutureQuals Data Protection Policy (Privacy Standard) based on GDPR best practice.

Policies are stored on Share Point. Additionally, in line with our Business Continuity Plan, a hard copy of every policy is held in the Executive Office, should IT systems fail. It is the responsibility of the Executive Office Manager to ensure that the latest version of a policy (or procedure/process) is available in hard copy.

2. Review

This policy shall be reviewed periodically by the Head of AO Operations, or updated should there be any changes to legislation, regulation or custom and practice and presented to the Executive Team (or Governing Body) for approval.

3. Feedback and complaints

We welcome your feedback, which helps us to improve the products and services we provide. We know that sometimes things go wrong, but if they do, we want to try to stop them from happening again. If you'd like to give us your feedback or you're unhappy with the service, you can contact us on AO@FutureQuals.com



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