



FutureQuals®

Conflict of Interest Policy

Who is this policy for

This policy applies to all individuals and organisations involved in the design, development, delivery, assessment, quality assurance, and awarding of FutureQuals qualifications.

Version	POL200-V26-1
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Version	Date	Description
POL200-V26-1	January 2026	Policy streamlined and reformatted. Previous policy reference – POL004-V25-1

Please note: This version replaces all previous versions.

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Policy

FutureQuals Staff and Associates

This section applies to all individuals directly employed by FutureQuals, members of staff and associates contracted to carry out work on behalf of FutureQuals (e.g. External Quality Assurers, Independent End-Point Assessors).

All individuals must:

- Disclose any actual or potential conflict of interest that could influence their judgement, objectivity, or decision-making.
- Complete the *Conflict of Interest Declaration Form* when a perceived or actual conflict is identified.
- Report any concerns to the Responsible Officer immediately.
- Ensure that their professional and personal interests do not compromise the integrity of FutureQuals qualifications, assessments or operations.
- Cooperate with any investigation or mitigation process initiated by FutureQuals.

Examples of relevant conflicts include:

- Having a personal or professional relationship with a centre delivering FutureQuals qualifications.
- Assessing or quality assuring work where there is a personal interest in the outcome.

The Responsible Officer is responsible for assessing reported conflicts of FutureQuals employed staff and associates working on behalf of FutureQuals, determining appropriate actions, and maintaining the *Conflict of Interest Register*.

Approved Centres and Centre Personnel

This section applies to all FutureQuals Approved Centres, including their staff, contractors, and any individuals involved in the delivery, assessment, or administration of FutureQuals qualifications.

Approved centres must:

- Implement systems and checks to prevent individuals with a personal interest from undertaking assessment or quality assurance activities.
- Ensure that all staff and contractors understand their obligation to disclose actual or potential conflicts of interest.
- Report any identified conflicts to FutureQuals AO Operations immediately, via the *Conflict of Interest Form* on the FutureQuals website.
- Monitor and manage conflicts within their own workforce and delivery partnerships, including when staff are shared across centres.

Examples of relevant conflicts include:

- A tutor assessing a learner who is a friend or relative.
- Internal quality assurance being conducted by someone with a vested interest in the assessment outcome.

FutureQuals will maintain a Centre Conflict of Interest Register and monitor reported conflicts.

Links to other policies

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

- Malpractice and Maladministration Policy

Links to regulatory criteria

Regulator	Regulatory rule or guidance document	Regulatory condition / principle
CCEA/ Ofqual/ QW	Standard / General Conditions of Recognition	A4, A6, A8, C2, G4, I1
Ofqual	EPA Qualification Level Conditions and Requirements	EPA3.2
SQA Accreditation	Regulatory Principles (2021)	RP1, RP13

Definitions

Actual Conflict of Interest	A situation where a conflict of interest is known to exist and has the potential to directly influence an individual's or organisation's decisions, actions, or judgement in a way that could compromise the integrity of FutureQuals qualifications or operations.
Approved Centre	An organisation formally recognised by FutureQuals to deliver and/or assess its qualifications, including all staff, contractors, and delivery partners involved in qualification administration, delivery, and assessment.
Associates	Individuals who are not directly employed by FutureQuals or an Approved Centres but who carry out work on their behalf.
Centre Personnel	Individuals working within or on behalf of an approved centre, including but not limited to Tutors, Assessors, Internal Quality Assurers, and Administrators.
Conflict of Interest	A situation where an individual or organisation has competing interests that could impair their ability to make objective, unbiased decisions in relation to the development, delivery, or award of FutureQuals qualifications.
Perceived Conflict of Interest	A situation where there may not be an actual conflict, but where an informed and reasonable observer could conclude that a person's interests might compromise their objectivity or decision-making. These must be treated with the same seriousness as actual conflicts to maintain trust and transparency.

Process

FutureQuals Staff and Associates

This process applies to all individuals directly employed by FutureQuals and associates working on its behalf (e.g. EQAs, IEPAs, consultants).

1. Identification and Disclosure

- Disclosures must be submitted using the *Conflict of Interest Form* (DOC110) to the Responsible Officer.

2. Initial Assessment

- The Responsible Officer will assess the nature and potential impact of the conflict.
- They will determine whether the conflict can be removed or must be managed.

3. Management and Mitigation

- If removable: the individual may be reassigned or withdrawn from relevant duties.
- If manageable: appropriate controls will be implemented (e.g. oversight, restricted involvement, enhanced monitoring).

4. Communication

- The individual will be informed in writing of any actions or controls required.

5. Recording and Monitoring

- All conflicts are logged in the *Conflict of Interest Register*.

6. Escalation

- If a conflict involves the Responsible Officer, an Associate Director or a company Director will conduct an investigation.

Approved Centres and Centre Personnel

1. Identification and Disclosure

- Disclosures must be reported to FutureQuals via the *Conflict of Interest Form* which can be found on the FutureQuals website.

2. Initial Assessment

- FutureQuals will assess the conflict and determine its impact on qualification delivery or assessment integrity, and the proposed mitigating measures by the Approved Centre.

3. Management and Mitigation

- If removable: the centre must reassign duties or remove the individual from the activity.
- If manageable: FutureQuals will specify controls to be implemented by the centre.

4. Communication

- The Head of Centre and relevant personnel will be informed in writing of the required actions or controls.

5. Recording and Monitoring

- Conflicts and measures (if applicable) are recorded in the Centre Conflict of Interest Register.

Review Date

This policy shall be reviewed periodically or updated should there be any changes to legislation, regulation or custom and practice.