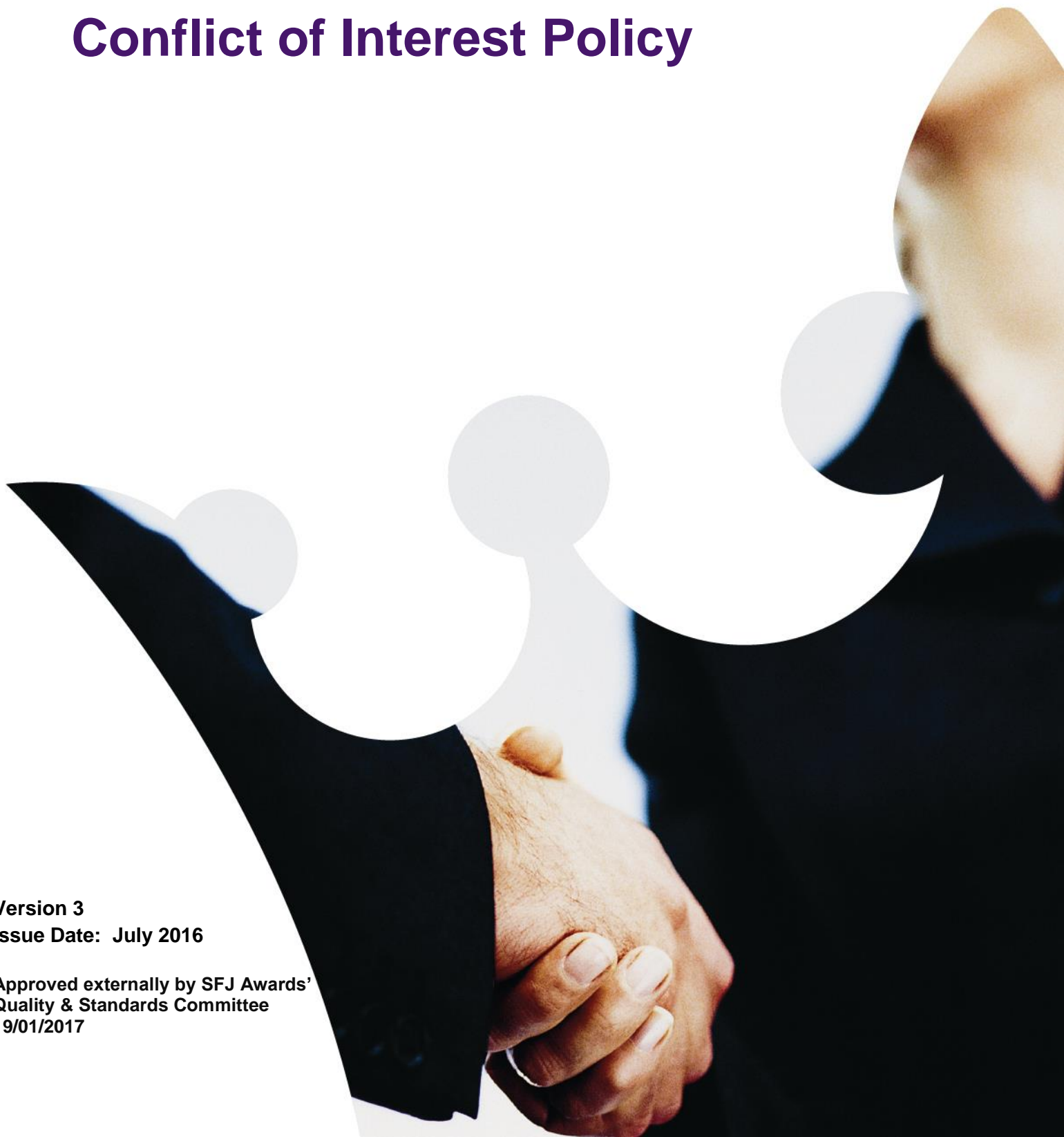


Conflict of Interest Policy

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**Approved externally by SFJ Awards'
Quality & Standards Committee**
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1 Purpose

All SFJ Awards approved centres must have appropriate policies in place for approval to be granted. By accepting SFJ Awards' Approved Centre Contract, the centre confirms they will adhere to the policies they have in place.

This policy is based on the knowledge that a centre's own policies and procedures have met the centre approval criteria.

This policy sets out how SFJ Awards will prevent and address issues that arise from real or perceived conflicts of interest, in the development, delivery and award of its qualifications.

2 Definitions

2.1 Conflict of Interest:

SFJ Awards defines a conflict of interest as:

- an interest or activity undertaken by any member of the Skills for Health and Justice Group that has the potential to lead that person to act contrary to SFJ Awards' best interests in the development, delivery and award of qualifications in accordance with its regulatory requirements.
- a person directly connected to the development, delivery or award of SFJ Awards' qualifications who has interests in any other activity which has the potential to lead that person to act contrary to his or her interests in the development, delivery or award of SFJ Awards' qualifications in accordance with its regulatory requirements.

Conflicts of interest can arise in a variety of circumstances - for example (*the list is not exhaustive and is intended for guidance only*):

- If an employee within an approved centre was to carry out both assessment and the internal quality assurance of that assessment, there is a clear conflict.
- External quality assurance of centres where the EQA is employed, or has been employed at any time within the last 3 years.
- Undertaking external quality assurance activity for or on behalf of other awarding organisations at the same centre.
- Being a recent former learner/student at the centre.

2.2 Adverse Effects:

For the purpose of this policy, an Adverse Effect is described as:

“An act, omission, event, incident or circumstance if it –

- a) gives rise to prejudice to Learners or potential Learners, or*
- b) adversely affects –*
 - i. the ability of the awarding organisation to undertake the development, delivery or award of qualifications in accordance with its Conditions of Recognition,*
 - ii. the standards of qualifications which the awarding organisation makes available or proposes to make available, or*
 - iii. public confidence in qualifications.”*

(Ofqual General Conditions of Recognition, June 2016)

For further details, please refer to SFJ Awards' Adverse Effects Policy available from our website: www.sfjawards.com/adverse

3 Roles and Responsibilities

Centre Staff:

- Are familiar with this policy and the centre's own conflict of interest policy.
- Are familiar with the implications of conflicts of Interest when delivering, assessing and internally quality assuring SFJ Awards qualifications.
- Notify the Head of Centre immediately of any actual or potential conflicts of interest that may arise.

Heads of Centre:

- Identify, manage and resolve any actual or potential conflicts of interest in delivery, assessment and internal quality assurance that may arise.
- Ensure staff meet the terms of SFJ Awards centre approval requirements outlined in the Approved Centre Criteria and SFJ Awards' Centre Handbook.
- Ensure centre staff are familiar with this and the centre's own conflict of interest policy, and the requirement to disclose any activity that has the potential to represent a conflict of interest.
- Maintain and monitor a conflicts of interest register.

SFJ Awards' External Quality Assurers (EQAs):

- Declare any actual or potential conflicts of interest relating to their role as an EQA as they arise.
- Ensure that approved centres comply with SFJ Awards' conflicts of interest centre requirements.

SFJ Awards Quality Assurance Officer:

- Allocate External Quality Assurers (EQAs) to centres, mindful of declared potential or actual conflicts of interest declared by the EQA team.
- Reallocate centre(s) to another External Quality Assurer when conflicts of interest are anticipated or arise.
- Arrange for another member of the EQA team to verify learners' work where an EQA identifies a conflict of interest once they are externally verifying a centre's learners' work.

SFJ Awards' Quality and Assessment Manager:

- To identify and resolve potential or actual Conflicts of Interest within the SFJ Awards Quality and External Quality Assurance team.
- Maintain and monitor the EQA conflicts of interest register.

SFJ Awards' Awarding Organisation Manager (Responsible Officer):

- Maintain and monitor the SFJ Awards Awarding Organisation and the Skills for Health and Justice Group conflicts of interest register.
- Manage potential or actual conflicts of interest identified within the conflicts of interest register.
- Make the conflicts of interest register available to SFJ Awards' Quality & Standards Committee for monitoring purposes.
- Make the conflicts of interest register available to the Qualifications Regulators for scrutiny, as requested.

SFJ Awards' Managing Director:

- To identify, manage and resolve potential or actual conflicts of interest within SFJ Awards Awarding Organisation and the Skills for Health and Justice Group.
- Update the conflicts of interest register accordingly.

SFJ Awards Quality and Standards Committee:

- Review the conflict of interest register at their quarterly meetings.
- Declare any actual or potential expressions of interest or conflicts of interest.

4 Identifying and Declaring Conflicts of Interest

Those acting on behalf of SFJ Awards must be free from an interest that could adversely influence their judgment, objectivity or loyalty to the organisation in conducting their activities. Where a conflict of interest is identified, it must be reported.

A consequence of a non-declared conflict of interest can be an *adverse effect*, as defined by the Qualifications Regulators, and as such must be taken very seriously. Please refer to Section 5.4.

Skills for Health and Justice Group, Board, SFJ Awards' Quality & Standards Committee and SFJ Awards' employees - must report any actual or potential conflicts of interest to the Managing Director.

Conflicts of interest are recorded in the conflict of interest register by the Awarding Organisation Manager. The conflict of interest register records the nature of the conflict, the potential adverse effect, the mitigating actions to be taken and the timescales for these actions.

The register is reviewed by the Managing Director and the Awarding Organisation Manager and monitored by SFJ Awards' Quality & Standards Committee.

SFJ Awards' External Consultants/Associates - must report any actual or potential conflicts of interest to the Quality & Assessment Manager as soon as possible.

Conflicts of Interest will be monitored by SFJ Awards' Quality & Assessment Manager. SFJ Awards' Quality Assurance Officer will consider potential and declared conflicts of interest when allocating centres to the EQA team and adjust allocations as necessary.

Centre Staff - must report any actual or potential conflicts of interest to the Head of Centre.

Conflicts of interest will be monitored by the Head of Centre and checked by the centre's allocated SFJ Awards EQA as part of their ongoing compliance monitoring of the centre.

5 Managing Conflicts of Interest

5.1 Governance

The requirement to declare an interest is a standard agenda item for all meetings of the Board and its Committee(s). SFJ Awards will use the information contained in the conflict of interest register to assess the suitability of those working or acting on behalf of the organisation. Where there are changes in organisational policy, procedures or practices or where there are changes in charity, company or regulatory requirements, SFJ Awards will reassess the suitability of those working or acting on its behalf.

5.2 External Quality Assurance

SFJ Awards will re-allocate centres where conflicts have been identified and will not allocate an EQA to any centre where there may be a conflict of interest.

Where an actual conflict of interest is identified by an EQA relating to an organisation they are already connected to, SFJ Awards will re-allocate the centre(s) concerned to another suitable member of the Associate EQA team.

It is SFJ Awards' intention to not allocate an EQA to any centre for more than 3 consecutive years.

5.3 Centres

SFJ Awards must ensure that all assessments are carried out with integrity. It is a condition of centre approval that an approved centre must have a process to identify, monitor and manage any conflicts of interest in assessment outcomes.

The centre must take all reasonable steps to avoid any part of the assessment of a learner being undertaken by any person who has a personal interest in the result of the assessment. This includes internal marking, assessment and quality assurance activities.

Depending upon the size of the centre, some roles may be undertaken by the same person, for example Head of Centre and Centre Coordinator. However, the assessor role and the internal verifier role must be carried out separately. The assessor cannot quality assure their own assessments as this presents a conflict of interest.

Individuals should not be involved in the assessment or the quality assurance of assessment decisions at a centre in which they have a personal interest or, where this happens, they must ensure that the assessment process is subject to scrutiny by those without personal interest.

Centres will need to have procedures in place for avoiding conflicts of interest and where a conflict of interest cannot be avoided, have procedures in place for managing that conflict of interest.

In most cases simple measures will be enough to manage a conflict of interest to ensure that no adverse effect arises. It may be that an activity can be managed differently so that the conflict of interest is avoided, eg a different member of the assessor team can undertake the assessment.

5.4 Adverse Effects

SFJ Awards, its associates/consultants and approved centres involved in the development, delivery or award of a qualification, must take all reasonable steps to ensure that no conflict of interest which relates to it has any adverse effect.

Where such a conflict of interest has had an adverse effect, SFJ Awards and/or the approved centre must take all reasonable steps to mitigate the adverse effect as far as possible and correct it.

Centres must promptly notify SFJ Awards when it has cause to believe that an event has occurred (or is likely to occur) which could have an adverse effect.

SFJ Awards will promptly notify the Qualifications Regulators when it has cause to believe that an event has occurred (or is likely to occur) which could have an adverse effect.

For further details, please refer to SFJ Awards' Adverse Effects Policy available from our website: www.sfjawards.com/adverse

6 Review of the Policy

This policy will be reviewed by the Quality and Assessment Manager on a regular basis as part of SFJ Awards' self-evaluation arrangements and revised as necessary in response to lessons learnt, customer feedback, changes in legislation and guidance received from the Qualifications Regulators.

Our review of the policy will ensure that SFJ Awards procedures continue to be consistent with the regulatory criteria and are applied appropriately and equitably.

Policies and formal amendments to policies are approved at the next meeting by the Quality & Standards Committee.

If you have any queries about the content of the policy or you wish to give feedback then please contact SFJ Awards Tel: 01142 841970 or email info@sfjawards.com

7 Location of the Policy

You can download copies of the policy from our website: www.sfjawards.com/conflict