



Conflict of Interest Policy & Procedure for Approved Centres

Document Specification:	
Purpose:	To ensure that Gatehouse Awards and its Approved Centres are able to identify, monitor and manage any risks associated with Conflicts of Interest in respect of the delivery and award of Regulated Qualifications
Accountability:	Gatehouse Awards Governing Body
Responsibility:	Quality Assurance Manager
Version:	5.1
Effective from:	1 st January 2016
Review date:	1 st January 2017
Links to Ofqual GCR	A4 and A6
Other relevant documents:	Gatehouse Awards Terms and Conditions of Business Gatehouse Awards Centre Handbook Gatehouse Awards Malpractice and Maladministration Policy

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1. Purpose

Gatehouse Awards Limited is an awarding organisation recognised by Ofqual. Everyone involved in the development, delivery, or award of Gatehouse Awards' qualifications, including all Approved Centres, has an obligation to behave in such a way that does not give rise to a conflict of interest. The purpose of this policy is to outline the process which must be undertaken in order for Gatehouse Awards and its Approved Centres to identify, monitor and manage Conflicts of Interest and any adverse effects arising from Conflicts of Interest and meet its obligations as stipulated by the General Conditions of Recognition published by Ofqual and amended from time to time.

The aim of this policy is to ensure that Gatehouse Awards and its Approved Centres are able to:

- Ensure that all reasonable steps are taken to avoid conflicts of interest by providing a system that protects themselves and others from criticism and compromise
- Identify cases of conflict of interest and if necessary take action in order to minimise or eliminate the potential damage of any adverse effects that could be caused
- Comply with the relevant regulatory and industry requirements

2. Scope

This policy applies to all activities undertaken by Gatehouse Awards Approved Centres, including all Directors, management and staff of those Centres, plus any Satellite Centres it may have, in respect of the delivery and award of qualifications. For the avoidance of doubt, this includes persons employed directly or indirectly by Gatehouse Awards Approved Centres, including contractors and consultants, etc.

3. Data Protection

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that all persons to whom this policy relates act in the best interests of the Candidates, the Centres delivering the qualifications and Gatehouse Awards. The information provided will not be used for any other purpose.

4. Definition of Conflict of Interest

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. These kinds of conflict could result in damage to the integrity and reputation of Gatehouse Awards, the qualifications it makes available, its Approved Centres, or the relevant Regulator of those qualifications and potentially have an adverse effect on Candidates.

The following are examples of situations that may constitute as a conflict of interest:

- Direct or indirect financial gain, such as bonus schemes for pass rates
- Direct or indirect benefits such as employment, sponsorship, gifts, hospitality, services or goods
- Reciprocal arrangements that compromise the ability to make reliable and professional judgements
- Marketing schemes which offer 'Guaranteed Passes'

- Personal interests in, connections to, or family relationships with Candidates who are taking a Gatehouse Awards qualification
- Situations where commitment, loyalty or integrity is compromised

5. Conflict of Interest Scenarios

The following are examples of potential conflicts of interest. This list is intended to illustrate the type of situation that would represent a conflict of interest, but is not exhaustive:

- A director, partner or staff member of a Gatehouse Awards 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
- A marker employed by Gatehouse Awards is marking the papers of a Centre in which a close family member has a financial interest
- An External Quality Assurer or Examinations Observer has a personal relationship (family, friend, business partner, etc.) with any Director, manager or staff member of a Centre where they are sent to carry out their quality assurance duties on behalf of Gatehouse Awards
- An Assessor at an Approved Centre assesses a Candidate who is their relative or friend
- Where an individual performs multiple roles: the additional role performed by an employee may come into conflict with the fulfilment of the responsibilities of each role
- 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 staff by offering Assessors and/or Internal Quality Assurers a bonus for the number of Candidates achieving a 'pass'
- A Centre offers Candidates a 'Guaranteed Pass' scheme, or a money-back guarantee scheme, which could compromise the integrity of the assessment and awarding process.

For the avoidance of doubt, all reasonable steps should be taken by the Centre to avoid any part of the assessment of Candidates by persons who may have a personal interest in the outcome of the assessment. This includes undertaking the role of Assessor, Internal Quality Assurer, or any other role carried out as part of the assessment of Gatehouse Awards qualifications.

6. Responsibility and Authority

Each Gatehouse Awards Approved Centre appoints a 'Head of Centre' to act as the single point of accountability for adhering to all policies, procedures and regulations as required by the Centre Statement of Commitment signed as part of the Centre Application 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.

The Individual Responsibility

- ✓ Every individual within Gatehouse Awards Approved Centres has responsibility for ensuring that they are familiar with the Conflict of Interest Policy and any guidelines.

- ✓ Where there is a perceived potential or actual conflict of interest, individual staff members are required to inform the Head of Centre, who will document and resolve the issue or escalate it to Gatehouse Awards. This includes where an individual undertakes additional employment, whether paid or voluntary, outside their employment with the Approved Centre. **Please Note: Even if a Centre resolves a potential Conflict of Interest, it MUST be declared to Gatehouse Awards with details of how the situation was resolved.**

7. Declaring A Conflict Of Interest

The most important feature of the procedure is the requirement that an individual disclose any activity if there is any doubt whether or not it represents a conflict of interest: if in doubt, report it.

All members of Gatehouse Awards Approved Centre staff are required to declare any situations giving rise to actual, potential, or perceived conflicts of interest during their induction training, and immediately when any changes occur.

An employee involved in a situation where there is, may be, or be perceived to be a conflict of interest shall disclose the situation giving rise to the conflict of interest, or perceived conflict, immediately and in writing to their line manager or Head of Centre.

A Declaration of Interests Form is provided for this purpose, listing examples of the types of interest you should declare. **Please note: this list is not exhaustive and the staff and Head of Centre should consider any relevant incidents for potential conflict of interest.**

Any declared interests, whether perceived, potential or actual will be recorded on Gatehouse Awards' Register of Interests, which will be maintained by Gatehouse Awards' Quality Assurance Manager. The register will be accessible to directors and senior management team.

8. Monitoring and Management of Identified Conflicts of Interest

Conflicts of interest can, and do, happen in almost all businesses from time to time. Whilst it is best, where possible, to avoid conflicts of interest, where they do occur it is important that they are identified, monitored and managed effectively in order to mitigate any potential risk they may pose.

Whilst all individuals are responsible for their own actions and any conflicts, the Head of Centre is ultimately responsible for identification of any perceived, potential or actual Conflicts of Interest within their Approved Centre. Once a conflict of interest has been identified it should be logged by the Centre and details of how it is being managed submitted to Gatehouse Awards' Quality Assurance Manager, including an updated declaration signed by the relevant individual. The Quality Assurance Manager enters the details onto the Register of Interests and then grades the conflict of interest as perceived, potential or actual, and can allocate a senior member of staff to assist the Head of Centre in bringing about a timely and effective resolution.

Any action taken in order to resolve it is recorded on the Register of Interests.

If the allocated member of staff is unable to resolve the identified conflict of interest with the Head of Centre, it is referred to the Responsible Officer who will review it again and identify any adverse effects and the action(s) required to negate or mitigate them, which will be recorded on the Register of Interests and monitored by the Responsible Officer for the duration of the conflict.

9. Requirement for Declaration

All Directors / Managers / Employees / Invigilators / Interlocutors / Consultants and/or Contractors are required to complete and sign a conflict of interest declaration (see Appendix 1):

- Prior to gaining initial Centre Approval
- On identification of an actual, perceived or potential conflict of interest
- On request by Gatehouse Awards, e.g. after a substantial amendment made to the policy

10. Failure to Disclose a Conflict of Interest

If a Conflict of Interest is discovered by Gatehouse Awards or its representatives which has not been disclosed by the Centre, Gatehouse Awards may view this as maladministration or, in some cases, malpractice by the Centre and apply the appropriate sanctions, as per the *Malpractice and Maladministration Policy and Procedure*.