

## **Skills4Stem Conflicts of Interest Policy**

All employees, contractors and other staff working on behalf of Skills4Stem will strive to avoid any conflict of interest between the interests of Skills4Stem on the one hand and personal, professional and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

It is the policy of Skills4Stem that employees and contractors must be free from conflicts of interest that could adversely affect their judgement or objectivity to the organisation in conducting business activities and assignments.

As an awarding body Centre, it is the policy of Skills4Stem and awarding body that tutors and assessors acting on behalf of an awarding body approved centre or awarding body recognised provider must also be free from conflicts of interest that could adversely affect their judgement or objectivity to the organisation in conducting business activities and assignments. awarding body recognises that tutors and assessors may take part in legitimate financial, business, charitable and other activities outside of their awarding body approved centre and awarding body recognised provider roles, but any potential conflict of interest raised by those activities must be acknowledged, disclosed, and in relevant cases properly managed.

It is the responsibility of each individual to recognise situations in which they have a conflict of interest, or might reasonably be seen by others to have a conflict; to disclose this conflict and to take such further steps as may be appropriate and set out in more detail under the procedure below.

Skills4Stem takes a three-step approach to conflicts of interest: identify, prevent, record.

### **1. Definition**

A conflict of interest may generally be defined as a conflict between the official responsibilities of an employee, contractor, tutor, assessor, and internal verifier and any other interests the particular individual may have and as such could compromise or appear to compromise their decisions.

Condition A4 in the Ofqual General Conditions of Recognition 2011 states that a conflict of interest exists in relation to an Awarding Organisation where:

- The organisations 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 accordance with its Conditions of Recognition
- 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 accordance with the awarding organisations conditions of recognition
- An informed and reasonable observer would conclude that either of the above situations was the case

## **2. Examples of Conflicts of Interests**

It is not possible to provide a definitive list of examples of conflicts of interests, but the following are examples of situations that could lead to actual or perceived conflicts of interest:

- Tutors and assessors working with a business outside Skills4Stem that is in direct competition with them
- Tutors and assessors working with a business outside of the approved awarding body centre or awarding body recognised provider that is in direct competition with them
- Tutors and assessors participating in the appointment, promotion, supervision or evaluation of a person with whom the person, has close or familial ties
- Tutors and assessors having a close or familial relationship with an awarding body registered learner, or learners' family whilst being involved in decisions about the outcome of their qualification
- Tutors and assessors using non public awarding body information or awarding body learner data for personal gain or advantage
- Tutors and assessors involved in the awarding body Centre approval processes, who own business consultancies offering awarding body qualifications or programmes.
- Receiving gifts must be addressed carefully in accordance with the Bribery Act and the Skills4Stem Bribery Policy.

The existence of such interests as those outlined above, does not necessarily imply conflict, but is likely to give an appearance of conflict and as such should be declared.

## **3. Process**

It is the duty of all employees, tutors and assessors to disclose any actual or potential conflict of interest, and the process for doing this is documented below:

- All employees and contractors, tutors and assessors are issued with a conflict of interest form to complete on commencement with the organisation and it is a requirement of their contract that this is completed and updated on an annual basis.
- The information held on the conflict of interest form is then transferred to a register of interest's document which is maintained by Skills4Stem.
- If the individual concerned has any changes to their declared circumstances, they must inform their line manager immediately in writing, so that the conflict of interest can be evaluated, and the register updated
- The form is to be completed even when the individual has no conflict of interest to declare.
- The information submitted is then evaluated to identify if any further action is required and a written record of the outcome of the evaluation is kept

#### **4. Action**

Most situations require no further action than the completion of the conflict of interest form. In some instances, however, the information declared on the form will require some follow up action, in order for the conflict of interest to be managed appropriately.

The approach agreed between the line manager and the tutor and assessor will be documented and held with the conflict of interest forms.

Examples of actions that could be taken:

- Individual not taking part in discussions or decisions of certain matters
- Referring certain matters for decision to others with no vested interest
- Agreeing not to be involved in a particular project or with a particular centre
- Declaring an interest when it is appropriate to do so
- Referring the matter to awarding body for advice and guidance.