

1. Purpose

This purpose of this policy is to protect the integrity of CfA Q assessments. It is designed to support staff by providing information on identifying, managing and mitigating conflicts of interest and potential conflicts of interest.

2. Scope

This policy applies to any individuals involved with any aspects of the delivery of assessment for CfA Q.

3. Regulatory authorities

Relevant regulatory authorities are:

- Ofqual

4. Audience

This document is for:

- CfA Q staff
- Assessors
- Internal quality assurers
- CfA board directors
- Freelance staff
- Regulators
- Apprentices

5. Definitions

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.**

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.

6. Policy statement

CfA Q recognises its responsibility to identify and manage all actual and potential conflicts of interest. The following are required of board members, relevant CfA Q staff, assessors and internal quality assurers and any others involved in the delivery of assessment:

- **a commitment to identifying and managing all actual and potential conflicts of interest** that may affect the effectiveness, level of regulatory compliance or reputation of CfA Q
- **in cases of doubt, commitment to contacting their line manager, or other relevant person of authority**, for advice in identifying a potential conflict of interest

Where conflicts of interest, or potential conflicts of interest, are identified, CfA Q will **take all reasonable steps to ensure that no conflict of interest which relates to it has an adverse effect** (Condition A4.3),

In any case where a conflict of interest nonetheless results in an adverse effect, CfA Q **will take all reasonable steps to mitigate the adverse effect** as far as possible and correct

In mitigating adverse effects, CfA Q will particularly consider its commitment to deliver fair assessment and accurate assessment outcomes for apprentices.

CfA Q maintains up-to-date records of all conflicts of interest which relate to it (the CfA Q conflicts of interest log).

CfA Q has a process in place for identification, analysis, action and monitoring relating to conflicts of interest which it expects all relevant staff and stakeholders to follow (the CfA conflicts of interest process).

While CfA Q has systems in place to identify and mitigate conflicts of interest, it is the responsibility of everyone associated with it to **identify and escalate conflicts of interest as they arise**.

Details of all documents that support this policy are listed in the section [relevant documents](#).

7. Relevant documents

Documents to support this policy are listed below, along with their location:

Document	Location
CfA Q conflicts of interest processes	EPAO operations handbook
CfA Q conflicts of interest declaration forms	EPAO admin. records
CfA Q conflicts of interest log	EPAO admin. records
CfA Q guidance of conflicts of interest	EPAO operations handbook
Ofqual guidance on conflicts of interest	EPAO operations handbook

8. Staff responsibilities

All staff involved with the delivery of assessment have responsibility to identify, manage and mitigate conflicts of interest.

The assessment centre manager manages the identifying, managing and mitigating of conflicts of interest and potential conflicts of interest on a day-to-day basis; they communicate all conflicts raised with the PDP Head, who supports the assessment centre manager and takes action as required. These additional responsibilities are outlined below:

Role	Responsibilities
Head professional development and practice	<ul style="list-style-type: none">• To be accountable for the implementation and review of this policy• To oversee the implementation of this policy, escalating concerns where appropriate• To direct and support the assessment centre manager in monitoring responses in declaration forms• To direct and support the assessment centre manager in taking any necessary mitigating action• To implement any necessary mitigating action• To complete relevant documentation, including the conflict of interest log
Assessment centre manager	<ul style="list-style-type: none">• To ensure that this policy is implemented, escalating concerns where appropriate• To manage documentation relating to this policy, including its review• To monitor responses in declaration forms, escalating concerns to the PDP head• To implement any necessary mitigating action• To complete relevant documentation, including the conflict of interest log