Conflicts of Interest Policy

Introduction

The purpose of this policy is to provide guidance to relevant individuals on handling possible conflicts of interest that may arise as a result of their role within City of London College (CLC), Assessors and IVs/IQAs of accredited units and qualifications. This policy applies to all staff and other individuals whenever they interact or potentially interact with any of CLC functions.

This policy:

- Defines the meaning of conflict of interest
- Sets out roles and responsibilities for managing conflict of interest, and
- Illustrations of potential conflict of interest situations.

Scope

It is the policy of CLC that Tutors, Assessors and IQA's acting on behalf of CLC (including those with whom CLC have a Partnership Arrangement) must be free from conflicts of interest that could adversely affect their judgement or objectivity to the organisation in conducting business activities and assignments. CLC recognises that tutors and assessors may take part in legitimate financial, business, charitable and other activities outside of the CLC centres and CLC 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.

Definition of conflict of interest

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. Conflicts of interest can arise in a variety of circumstances in relation to awarding organisation activity, for example:

- Where the training delivery function and the awarding function rest within one organisation and the functions are not strictly defined

- When an individual has a position of authority in one organisation which conflicts with his or her interests in another organisation
- When an individual has personal interests that conflict with his/her professional position
- Where someone works for or carries out work on CLC behalf, who has friends or relatives taking CLC assessments
- A conflict of interest may generally be defined as a conflict between the official responsibilities of a tutor, assessor, and IV/IQA and any other interests the particular individual may have and as such could compromise or appear to compromise their decisions with learners
- A person who is connected to the development, delivery or award of qualifications by CLC 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

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, assessors and IV/IQA's working with a business outside of the approved CLC centre or CLC recognised provider that is in direct competition with them
- Tutors, assessors and IV/IQA's participating in the appointment, supervision evaluation or assessment of a person with whom the person, has close or familial ties
- Tutors, assessors and IV/IQA's having a close or familial relationship with CLC registered learner(s), or learners' family whilst being involved in decisions about the outcome of their accreditation or qualification
- Or where the person whose remuneration is in part determined by the outcome of the assessment
- Tutors, assessors and IV/IQA's using non-public CLC information or CLC learner data for personal gain or advantage

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.

Roles and responsibilities

All relevant staff undertaking assessment ('assessors'), IV/IQA ('Internal Verifier/Internal Quality Assurer') and other individuals have a responsibility to be aware of the potential for a conflict of interest. It is likely that individuals working closely with CLC function will encounter potential conflicts of interest from time to time. Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact on the standards of, or public confidence in, regulated units and qualifications and in CLC or any awarding organisations' reputation. A declaration of interest by an assessor or IQA is a declaration of a personal interest in the result of the assessment.

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

Any conflict of interest should be disclosed and recorded on a conflict of interest document, which is maintained by a designated person at CLC. If the individual concerned has any changes to their declared circumstances, they must inform their line manager/centre manager immediately in writing, so that the conflict of interest can be evaluated, and the register updated. 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.

Policy Review

This policy will be reviewed on an annual basis, or if there is a change in legal or other business related requirement.

Review Date	Description	Reviewer
August 2023	Conflict of Interest	SMT Team

Document History

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