



Conflict of Interest Policy

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Introduction

HSPCL is required to have in place a Conflict of Interest policy that enables us to identify, manage and mitigate any potential conflicts of interest. All staff and other individuals have a responsibility to be aware of the potential for a conflict of interest.

Purpose

The purpose of this policy is to protect our integrity as a business and the integrity of our qualifications. The policy is also designed to protect our staff by providing guidance on handling possible conflicts of interest that may arise as a result of the Company's role in delivering courses or providing advice to our clients.

This policy:

- defines what is meant by conflict of interest.
- describes the role of conflict of interest in the context of working with, or for, an awarding organisation.
- sets out the responsibilities for managing conflict of interest at each level in the organisation.

Scope of policy

This policy applies to all staff and other individuals who interact or potentially interact with the work of the awarding organisation. This includes individuals involved with any aspects of the creation, marketing, sales, distribution, marking or any other activity connected with qualifications, tests and assessments, and supporting resources and services.

The individuals falling within the scope of this policy include all staff employed by the Company on a full time, part time or casual basis.

Definition of conflict of interest

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

Conflicts of interest can arise in a variety of circumstances for example:

- When an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation.
- When an individual has interests that conflict with his or her professional position
- Where someone works for or carries out work on the Company's behalf but may have personal interests – paid or unpaid – in another business.
- Where someone works for or carries out work on the Company's behalf, who has friends or relatives taking assessments or examinations.

The Joint Council for Qualifications (JCQ) has specific requirements regarding potential conflicts of interest relating to examinations:

The awarding bodies are required by the qualification regulators to ensure that any Conflict of Interest in relation to the design, delivery and awarding of examinations/assessments is identified, recorded and managed effectively. In turn, centres are required to take all



reasonable steps to ensure that the awarding bodies are able to comply with this regulatory condition.

What is a Conflict of Interest?

In this context, a Conflict of Interest occurs where any member of staff who has access to privileged information, or is responsible for making decisions about assessment outcomes, could, potentially, use that information, or their position, to give an unfair advantage to a close friend or relative entered for an examination/assessment at your or any other centre. The term 'Related People' is used to cover close friends or relatives. A Conflict of Interest also occurs if any member of your centre's staff is entered for an examination/assessment.

Who are 'Related People'?

'Related People' are those with whom the member of staff has a close relationship. It would certainly include spouses, children and siblings, but would also include close friends, relatives and members of the household where there is regular contact, such that privileged information might be shared inappropriately. A step-relative, cousin, niece, etc., would count if the contact with that person was close and frequent.

Principles

The Company will:

Review its processes annually to ensure that all conflicts of interest or potential conflicts of interest are managed and resolved.

Ensure that the contractual arrangements clearly set out any obligations on them to declare and manage conflicts of interest arising from other activities that they undertake.

Ensure that anyone who has access to confidential assessment material for a qualification understands the confidential nature of the content.

Ensure that all members of staff declare any interest for friends or family sitting examinations.

Responsibilities

The Managing Director has the ultimate responsibility for the Conflict of Interest policy, dissemination of the policy and management of potential and actual conflicts of interest

Managers are responsible for communicating the Conflict of Interest Policy to all relevant individuals within their areas of responsibility annually.

All staff are required to review their procedures annually to ensure that they anticipate and manage potential or actual conflicts of interest.

Line managers are responsible for ensuring that all new staff receive conflict of interest information.

Any potential or actual conflict of interest must be documented by the managing director. He must either resolve the issue or, for issues that cannot be resolved at this level.

The Directors will ensure that all JCQ requirements are adhered to and will maintain appropriate records accordingly



All staff

Staff have responsibility for ensuring that they are familiar with the Conflict of Interest Policy, any guidelines and complete and required conflict of interest training.

All individuals will be required annually to read and understand the Conflict of Interest Policy.

The most important feature of the policy is the requirement that an individual disclose any activity that might give rise to a potential conflict of interest. If there is any doubt whether or not it represents a conflict of interest it should be reported.

The individual and line manager are equally responsible for ensuring that the issue is documented carefully.

An individual may wish to raise concerns relating to conflict of interest directly with the Managing Director. This may be done in confidence and they are entitled to receive a response to their concerns.

Any staff member considering paid or unpaid work outside of the Company should inform their manager if they think there is any potential for a conflict of interest. If the staff member is unsure whether a conflict of interest might arise, they should discuss this with their line manager first. The line manager should contact the Director if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A staff member must not take on any such activities that could be deemed to compete or conflict with HSPCL's activities.

Prior to each examination series all staff and other individuals, must inform the director of any candidates being entered for its examinations who are family members, other relatives or friends.

The Managing Director is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the business and, when necessary, to the Awarding Body

The Director will begin an investigation of any issues identified within 48 hours. A preliminary report will be made available to the Managing Director and if required the Awarding Body, within 5 working days.

A handwritten signature in brown ink, reading 'Peter Robertshaw', is positioned above the printed name.

Peter Robertshaw

Managing Director

1 January 2023



Annexe 1

Conflict of Interest log

Date recorded	Staff name & job title(s)	Interest declared	Nature of any potential Conflict of Interest	Specific Conflict of Interest	Steps being taken to manage the risk represented by any Conflict of Interest
	<i>Example</i>	<i>Sitting exam/assessment at this centre</i>		<i>Declared to awarding body</i>	<i>The following protocols are in place: (to prevent the member of staff having access to exam/assessment materials prior to the exam/assessment and that other centre staff are briefed on maintaining the integrity and confidentiality of the examination materials)</i>

This log will be kept for a minimum of one year after results have been issued for the relevant exam series