Conflict of Interest Policy

V25.2

Conflict of Interest Policy	
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Policy/Document Relates to	End-Point Assessment Provision, Awarding Provision, Endorsed Provision, Corporate
Policy/Document is for the use of	Learners, Apprentices, Training Providers, Recognised Centres, VQA Employees, Third Parties,
Should be read in conjunction with	Complaints Policy, Malpractice and Maladministration Policy, Reasonable Adjustments and Special Considerations Policy

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Introduction

VQA is committed to maintaining the highest level of integrity in the activities it undertakes. As such, VQA offers the below Conflicts of Interest Policy in order to outline its approach to identifying, monitoring and managing conflicts of interest which relate to it.

It also assures all partners and third parties that VQA will manage all such real or potential conflicts of interest appropriately and that our actions will not compromise the quality or the integrity of our assessment processes.

It may, from time to time, be given to external parties such as External Quality Assurers or the regulators upon request, to satisfy them of our ability to comply with their requirements concerning conflicts of interest and preventing such conflicts resulting in 'Adverse Effects' (as defined by the regulators). It is also to be used by VQA staff members, to ensure conflicts of interest are identified, managed, and monitored consistently.

VQA Internal Responsibility

The Compliance Manager is responsible for the maintenance and compliance of this policy. If the Compliance Manager is absent, the Head of Regulatory Compliance will appoint another appropriate colleague to ensure all VQA actions and activities are in line with the content of this policy.

The Managing Director has overall responsibility for ensuring that this policy complies with our ethical and legal commitments and that all VQA actions and activities are in line with the contents of this policy.

Review arrangements

We will review the policy as part of our annual self-evaluation process and revise it as and when necessary from the following sources; in response to feedback, trends from our internal monitoring arrangements, changes in our practices, actions by regulatory authorities or external agencies or changes in legislation.

The annual review of this policy will be undertaken by the Regulatory Compliance pillar approximately four weeks prior to the submission of VQA's Statement of Compliance to our regulators. Any amendments or updates to this policy will be approved by VQA's Leadership Team.

Where the regulators notify VQA of failures that have been discovered in the conflict of interest processes of another awarding organisation, VQA will review whether or not a similar failure could affect our processes and arrangements and take action to amend this policy where necessary.

If you would like to raise any points or offer feedback regarding this policy, please contact us via the details provided at the start of this document.

Centre's responsibility

Training Provider or Recognised Centre staff involved in the delivery, management, assessment, and quality assurance of our qualifications (including End-Point Assessments) must be fully aware of the contents of this policy.

It is required that Recognised Centres have arrangements in place to identify, monitor and manage actual and potential conflicts of interest.

Definition of a Conflict of Interest

For the purposes of this policy, VQA uses the following definitions to describe Conflicts of Interest:

- A Conflict of Interest exists where an individual or organisation has, or could be reasonably seen to have, competing interests in the outcome of a decision made by that individual or organisation.
- A Personal Conflict of Interest exists in relation to VQA when an individual has a connection to another individual or organisation which has, or could be reasonably seen to have, a competing interest in the outcome of a decision made by that individual on behalf of VQA.
- An Organisational Conflict of Interest exists in relation to VQA when another organisation or another element of VQA has, or could be reasonably seen to have, a competing interest in the outcome of a decision made by VQA or an element of VQA.

For the purposes of this policy, a Third Party Colleague is any individual who holds a contract to conduct work on behalf of VQA but is not otherwise a VQA Employee.

Conflict of Interest principles

In implementing VQA's approach to identifying and managing actual/potential conflicts of interest, VQA Employees and Third-Party Colleagues are expected to be:

- transparent in helping identify conflicts of interest
- committed to the ongoing management of identified conflicts
- proactive in identifying, monitoring, and managing organisational conflicts that relate to their team
- engaged with improving and developing approaches to conflicts of interest.

Identifying Personal Conflicts of Interest at VQA

All VQA Employees and Third-Party Colleagues are required to declare conflicts of interest upon the commencement of their contract.

This declaration is required to be updated at least annually, and updated should a change in circumstances arise.

VQA Employees and Third-Party Colleagues will not be able to conduct work on behalf of VQA until the declaration has been made, and will be unable to conduct work on behalf of VQA if the declaration has not been updated within a year, or reviewed and declared as correct within a year.

Failure to provide an accurate declaration or to record a declaration when prompted to do so may lead to disciplinary action.

The Compliance Team is responsible for the maintenance of the Personal Conflict of Interest Register and monitoring its use.

Managing Personal Conflicts of Interest at VQA

VQA, where possible, will seek to ensure that no activity undertaken by a VQA Employee or Third-Party Colleague is conducted by an individual with a connection to an individual or organisation with a competing interest in the outcome of the activity.

Where such a situation is unavoidable, VQA will ensure that the activity is subject to an appropriate mitigation and, where possible and appropriate, subject to scrutiny by an individual with no relevant Personal Conflict of Interest.

Where an individual becomes aware of a Personal Conflict of Interest in an item of work to be carried out by a VQA Employee or Third Party Colleague on behalf of VQA, or where they might be reasonably seen to have a Personal Conflict of Interest concerning an item of work, but this conflict is not already identified and managed, that individual is expected to immediately notify the Compliance Team, and conduct no further work until the conflict is appropriately recorded and a suitable mitigation is implemented.

In the below circumstances, it is not appropriate to offer mitigation, and so it is mandatory for an individual with no Personal Conflict of Interest to be assigned the activity:

- Investigation into suspected or alleged malpractice
- Investigation into suspected or alleged breaches of confidentiality
- Appeals handling.

The Compliance Team is responsible for monitoring the effectiveness of mitigations and ensuring identified Personal Conflicts of Interest do not manifest in Adverse Effects.

Identifying and managing Organisational Conflicts of Interest at VQA

The Leadership Team is responsible for the maintenance and review of the Organisational Conflict of Interest Register.

As part of VQA's commitment to ongoing review, individual teams are expected to identify and inform the Leadership Team of any actual or potential Organisational Conflicts of Interest that could impact VQA, and which are not already identified.

In addition, they are required to manage and monitor any identified Organisational Conflict of Interest that relates to their area of operations, and any associated mitigations. Should the status of any identified Organisational Conflict of Interest or the associated mitigations change, then the manager responsible for the team must inform the Leadership Team so that they can update the details on the register, as required.

The Leadership Team is responsible for reviewing the effectiveness of mitigations at ensuring identified Organisational Conflicts of Interest do not manifest in Adverse Effects.

Recognised Centre responsibilities in dealing with Conflicts of Interest that relate to VQA

Recognised Centres are required to have arrangements in place to identify, monitor and manage actual and potential Conflicts of Interest.

It is required that Recognised Centres have, and adhere to, a written conflicts of interest policy, which must be made available to VQA staff on request and describes the processes the Centre has in place to identify, monitor and manage actual and potential Conflicts of Interest.

VQA expects Recognised Centre staff to have provided the Centre with a declaration of Conflicts of Interest where they will be involved in supporting the delivery of VQA qualifications.

A Recognised Centre must be able to provide evidence of compliance with its conflict of interest policy when asked to do so in the course of External Quality Assurance activities

Dealing with a breach of the Conflict of Interest Policy

Should a VQA Employee or Third-Party Colleague believe there has been a breach of this policy, the Compliance Team must be informed.

An investigation will be carried out, including a review of the associated procedures. This will be led by the Compliance Team, unless they are under investigation, in which case the investigation

would be led by the Head of Regulatory Compliance or, if required, an alternative member of staff or external party will be appointed, and the outcomes reported to the Leadership Team.

Oversight

The effectiveness of VQA's approach to identifying and managing Conflicts of Interest will be reviewed regularly by the Board.

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