



Future (Awards and Qualifications) Ltd

Conflicts of Interest Policy

Version September 2017

www.futurequals.com

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Document Control Information

Document Details	
Document Name	Conflict of Interest Policy
Purpose of Document	Sets out Future (Awards and Qualifications) Ltd position on conflicts of interest, the procedures that are to be followed should conflicts be identified. It outlines the approach Future (Awards and Qualifications) Ltd takes in identifying, monitoring and evaluating actual and potential conflicts that may affect the awarding organisation now and in the future.
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Version Number	Date Approved	Change/Reasons for Change/Comments
V May 2017	February 2017	Conflict of Interest Policy amended to reflect revised Future (Awards and Qualifications) Ltd internal roles and responsibilities for the management and mitigation of conflicts of interest.
V September 2017	September 2017	Amended to include reference to end point assessments.

Introduction to Future (Awards and Qualifications) Ltd

Future (Awards and Qualifications) Ltd is forward thinking, learner and customer-focussed, and committed to delivering inspiring learning and skills.

Our Values

"We are a Visionary, Supportive, Innovative and Professional Awarding Organisation that is committed to excellence"

Our Vision

"We envisage a place in which every learner realises their full potential"

Our Mission

"To provide respected and valued qualifications and assessment to enable quality assured learning"

Future is recognised to deliver regulated qualifications by Ofqual in England, CCEA Regulation in Northern Ireland, the Scottish Qualifications Authority (SQA Accreditation) and Qualifications Wales to offer a comprehensive and diverse range of qualifications across a wide range of vocational areas many of which are transferable across industries and sectors.

Future has been assessed by the Education and Skills Funding Agency as being suitable to conduct independent end point assessment of apprentices and be in receipt of public funds.

A full list of Future's current qualifications and end point assessments can be accessed at www.futurequals.com

We have developed a genuine understanding and insight into all types of educational organisations, which ensures that we are highly responsive to their needs. We offer a wide range of benefits and support for our learners, our approved centres, and their assessment and quality assurance teams.

Future offers a wide range of benefits and support for all of our educational products and services including:

- Vocational qualifications accredited by the UK regulators and recognised by employers, universities and professional bodies
- 24/7 online management systems for the registration of learners, ensuring highly efficient services and access to assessment and results.
- A diverse range of qualifications and end point assessments
- A flexible approach to assessment
- A network of professionals who examine and quality assure our regulated qualifications and assessments
- Regular updates on new developments in education and training
- Unrivalled customer service support and extensive guidance materials

Conflicts of Interest Policy

Introduction

Future (Awards and Qualifications) Ltd is committed to ensuring that all of its activities are free from bias. The purpose of this policy is to protect the integrity of our qualifications and our business.

The policy provides guidance to members of staff and those contracted to work on behalf of Future (Awards and Qualifications) Ltd on how to handle possible and actual conflicts of interest that may arise as a result of our role as an awarding organisation.

The policy provides members of staff and those contracted to work for Future (Awards and Qualifications) Ltd with information that must be considered when performing their duties and undertaking any activity on behalf of the awarding organisation.

It sets out Future (Awards and Qualifications) Ltd's position on conflicts of interest, the procedures that are to be followed should conflicts be identified. It also outlines the approach Future (Awards and Qualifications) Ltd takes in identifying, monitoring and evaluating actual and potential conflicts that may affect the awarding organisation now and in the future.

The scope of the policy extends to all Future (Awards and Qualifications) Ltd staff and any other individuals that interact or potentially interact with us as an awarding organisation. This includes individuals involved with any aspects of the design, development, award, marketing, sales or any other activity connected to Future (Awards and Qualifications) Ltd qualifications and assessments.

Definition

Conflicts of interest inhibit free discussion and could result in decisions or actions that are not in the interests of Future (Awards and Qualifications) Ltd and risk the perception that we have acted improperly.

A conflict of interest may arise where there are competing interests or loyalties which compromises or is perceived to compromise the ability to make unbiased judgements. In the case of an individual, the conflict of interest could compromise or appear to compromise the ability to make unbiased decisions and/or judgements if not managed.

Specifically, in respect of Future (Awards and Qualifications) Ltd as an awarding organisation and an end point assessment organisation, a conflict of interest exists, as defined by Ofqual's General Conditions of Recognition, where:

- 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 (*or end point assessments*) in accordance with its Conditions of Recognition,
- a person who is connected to the development, delivery or award of qualifications (*or end point assessments*) 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 organisation's Conditions of Recognition, or
- an informed and reasonable observer would conclude that either of these situations was the case

Conflicts of interest can arise in a variety of circumstances relating to awarding organisation activity, for example:

- Where an individual works for or carries out work (paid or unpaid) on behalf of another business which either uses products or services, or produces similar products, or is in direct competition with Future (Awards and Qualifications) Ltd
- Where an individual is carrying out assessment or quality assurance activities for any centre where there is a personal interest
- Where a member of Future (Awards and Qualifications) Ltd' Governing Body or member of staff has a professional interest in a Future (Awards and Qualifications) Ltd' recognised Centre or training provider (for the purposes of end point assessment).
- When assessment and internal quality assurance activity is undertaken at a Centre by the same person
- Where an individual is internally or externally marking assessments for Future (Awards and Qualifications) Ltd and works for a Centre or training provider who delivers qualifications or end point assessments belonging to Future (Awards and Qualifications) Ltd.
- Where an individual is assessing or internally marking assessments of a learner who is a friend or relative and making decisions about the outcome of their qualification

Identification of potential conflicts of interest

Future (Awards and Qualifications) Ltd recognises that individuals may take part in legitimate financial, business, charitable or other activities outside their Future (Awards and Qualifications) Ltd role.

However, there is a requirement for all individuals to disclose any activity that might give rise to a potential or actual conflict of interest. If there is any doubt whether or not it represents a conflict of interest, it must be reported.

Therefore, individual team members and managers, members of the Executive Committee and the Governing Body are expected to proactively inform the Responsible Officer immediately of any actual or potential conflicts of interest that could adversely influence their judgement and objectivity and impact the awarding organisation.

Future (Awards and Qualifications) Ltd will also complete due diligence checks to assist the identification and verification of information at any time that may involve the use of external business information providers. This is to ensure that we have taken all reasonable precautions to identify and deal with potential and actual conflicts and protect the interests of the business, customers and learners.

The Responsible Officer is responsible for ensuring that all issues reported internally or by a third party are investigated, that the individual circumstances of each conflict are considered and the potential for influencing the activities of the awarding organisation or end point assessment organisation are dealt with appropriately and escalated internally or to the Governing Body when necessary.

If the conflict relates to the Responsible Officer, the Chair of the Governing Body and CEO will investigate and agree the appropriate actions to manage or remove the conflict of interest.

If the status of any identified conflict change or the controls put in place to mitigate the conflict change, this must be reported immediately to the Responsible Officer.

All employees and others acting on Future (Awards and Qualifications) Ltd behalf including contractors, associates and the Governing Body are required to complete a Declaration of Interest Form (see Appendix 2) on commencement of their relationship with Future (Awards and Qualifications) Ltd and annually thereafter.

As part of the centre approval process, all Future (Awards and Qualifications) Ltd Centres are required to have in place a conflict of interest policy which is subject to review as part of the quality assurance arrangements in place for monitoring of Centres.

A Centre must have systems and checks in place to ensure that an assessment is not undertaken by anyone who has a personal interest in the result of the assessment. Any potential or actual conflicts identified by the centre or by a member of Future (Awards and Qualifications) Ltd external or internal quality assurance team, must be reported to the Head of Quality for review and internal escalation to the Responsible Officer and to the Executive Committee where necessary.

Occasionally it may not be possible to avoid a situation where assessment or verification is undertaken by a person who has an interest in the result, for example where very specialist knowledge is required. In such situations, a conflict of interest declaration form would need to be completed to ensure that the conflict has been recorded.

Future (Awards and Qualifications) Ltd will then assist in the facilitation of arrangements whereby the assessment is scrutinised by another person to ensure that all systems have been correctly followed. The arrangements and outcomes of the scrutiny are recorded on the EQA report (IQA report for the purposes of end point assessment), reviewed by the Head of Quality and the Responsible Officer and retained electronically in the Future (Awards and Qualifications) Ltd cloud based online Document Management system, Huddle.

Future (Awards and Qualifications) Ltd maintains a register of conflicts of interest where all actual and potential conflicts of interest are recorded. An example of specific potential conflicts that may occur and how they may be managed to protect the interests of learners can be found in Appendix 1 and demonstrates the actions taken to protect learner interests. The list is indicative only and there may be other matters which constitute a conflict of interest.

Whilst the overall responsibility for conflicts of interests rests with the Responsible Officer, the register is reviewed at Executive Committee monthly meetings and quarterly by the Governing Body as part of its risk management system. The effectiveness of the process is also reviewed and, where appropriate, changes to the policy and procedures made and monitored.

Managing conflict of interest

Where a declaration of an actual conflict of interest is identified then the process for managing the conflict will follow these steps:

- The Responsible Officer will initially assess the impact of the conflict of interest and any action already taken to ensure that there is no adverse effect
- If possible the conflict will be removed
- If the conflict cannot be removed and requires management, the Responsible Officer will liaise with the CEO and the relevant Head of Service to consider and discuss the necessary actions and controls that need to be put in place to manage and mitigate any impact on the awarding organisation/end point assessment organisation to ensure that learners are not adversely affected

- The conflict will be recorded on the Register of Conflict's and its management reviewed by the Executive Committee monthly and quarterly by the Governing Body
- In the event of a conflict being declared or identified relating to the Responsible Officer, the Chair of the Governing Body and CEO will investigate and agree the appropriate actions to manage or remove the conflict of interest
- In the event of a conflict being declared or identified relating to the CEO, the Chair of the Governing Body and Responsible Officer will investigate and agree the appropriate actions to manage or remove the conflict of interest
- In the event of a conflict being declared or identified related to a member of the Governing Body, the CEO will convene an Extraordinary Governing Body meeting to discuss the necessary actions and controls that need to be put in place to manage and mitigate any impact on the awarding organisation to ensure that learners are not adversely affected

Conflict of interest roles and responsibilities

Oversight of the Conflict of interest policy, dissemination of the policy and management of potential and actual conflicts of interest rests with the Future (Awards and Qualifications) Ltd Governing Body. The Governing Body delegates the responsibility of the implementation of the policy to the Responsible Officer.

The Responsible Officer is responsible for ensuring that staff, contractors and other third party conflicts of interest are identified and monitored and that all necessary mitigating action is taken. In addition to this, all Future (Awards and Qualifications) Ltd Heads of Service are required to review their procedures annually to ensure that they anticipate and manage potential or actual conflicts of interest.

The Responsible Officer has responsibility for ensuring that Governing Body member's conflicts of interest are identified and monitored and that all necessary mitigating action is taken.

The Register of Interests is circulated with the Governing Body papers prior to each meeting. There is a standing item on the agenda at each meeting which provides the opportunity for a Governing Body member to draw member's attention to any conflicts of interest that have arisen in relation to an item on the agenda. All discussions and decisions about the appropriateness of a Governing Body member's attendance for an item where a conflict may exist or is perceived to exist are minuted for visibility along with any subsequent actions and the Register of Interests updated.

The Responsible Officer is also responsible for:

- Establishing and maintaining the conflict of interest policy and procedures.
- Ensuring the conflict of interest register is maintained.
- Ensuring the conflict of interest register is reviewed by the Executive Committee at each meeting and that the Governing Body reviews the register quarterly to ensure oversight.
- Coordinating a response to any potential conflict of interest raised by others and recommending action if an adverse effect is notified to Future (Awards and Qualifications) Ltd.
- Requiring new staff and associates to complete the declaration, filing them in personnel records and ensuring the information is available to anyone allocating work to that individual.
- Ensuring that all staff and associates are aware of the Conflict of Interest Policy.
- Sending out and receiving back annual declarations from all staff and associates and filing them in personnel records.
- Updating records following receipt of new conflicts of interest from directors, staff and associates and ensuring the information is available to anyone allocating work to that individual.

The Head of Quality is responsible for:

- Ensuring that potential conflicts of interest are taken into account when allocating External Quality Assurers to centres or end point assessors to assessment sites
- Ensuring that the Centre Agreement and centre approval process covers conflicts of interest in assessment.
- Monitoring centres' compliance with this requirement

The Head of Qualifications is responsible for:

- Ensuring that potential conflicts of interest are taken into account when employing consultants to work on qualifications or assessment design or development.

It is possible that a real or potential conflict of interest is reported to Future (Awards and Qualifications) Ltd by the regulators, a learner or a member of the public or other stakeholder. This will be either via a formal communication or via the customer services email. Any member of staff that receives such a communication should forward it to the Responsible Officer who will coordinate any response or action required.

The Responsible Officer will also report all such communications to the Executive Committee and the Governing Body immediately as they have the potential to damage Future (Awards and Qualifications) Ltd reputation even if they are only perceived conflicts of interest.

Records of all conflicts, any related investigations and outcomes are retained for 5 years.

Policy Review Arrangements

This policy is subject to a three-year review cycle, or earlier should any feedback or concern be brought to the attention of Future (Awards and Qualifications) Ltd, to ensure it remains fit for purpose and the process and its outcomes are deliverable.

It is also reviewed as part of Future (Awards and Qualifications) Ltd continuous improvement monitoring through its annual self-assessment arrangements.

Appendix 1 - Register of Potential Conflicts of Interest (indicative examples only).

Role	Potential Conflicts of Interest	Responses
Future (Awards and Qualifications) Ltd Directors and/or the Responsible Officer	<p>The wider commercial activities of Future (Awards and Qualifications) Ltd Directors and the awarding activities specifically undertaken by Future (Awards and Qualifications) Ltd.</p> <p>Future (Awards and Qualifications) Ltd Chief Executive is the majority shareholder and also the Responsible Officer.</p>	<p>All staff including senior officers and Governing Body members are required to declare to Future (Awards and Qualifications) Ltd if they have a current or recent financial or professional interest that may adversely affect the Awarding Organisation (AO).</p> <p>Confidentiality clauses are embedded in contracts to ensure that confidentiality of any work related to the development, delivery and award of Future (Awards and Qualifications) Ltd qualifications/assessments is maintained. Legal review of contracts undertaken where necessary.</p> <p>The Terms of Reference of the Governing Body and the Memorandum of Association that is in place ensure it would not be possible for a decision to be made that would be detrimental to Future based on competing priorities or an individual's financial or commercial gain. Nor would it be possible to influence a decision on the appointment of an alternative Responsible Officer.</p>
External Quality Assurance Consultants and Independent End Point Assessors (IEPA'S)	<p>EQA's/IEPA's quality assure or assess the work of a learner with whom they have a personal interest or connection.</p> <p>EQA's /IEPA's work directly with another Awarding Organisation or assessment site where they could use their knowledge of Future (Awards and Qualifications) Ltd activities adversely.</p>	<p>Confidentiality clauses are included in all contracts to ensure that confidentiality of any work related to the development, delivery and award of Future (Awards and Qualifications) Ltd qualifications and assessments is maintained. Legal review of contracts undertaken where necessary.</p> <p>EQAs/IEPA's are not given work at any centre with whom they have had a working or financial relationship during the previous three years.</p> <p>EQAs/IEPA's are required to declare to Future (Awards and Qualifications) Ltd if they have a current or recent financial or professional interest in a centre which has been allocated to them for external quality assurance/assessment purposes. The extent of the conflict will be evaluated and action taken which includes reallocating a centre to an alternative EQA/IEPA.</p> <p>Should a conflict of interest be discovered which was not declared the contract of employment with the EQA/IEPA can be terminated and the decisions undertaken by the EQA/IEPA will be reviewed.</p>
Consultants	Contractors and consultants who are working in any capacity in relation to the functions of Future (Awards and	Contracts put in place with contractors that include specified deliverables and service level agreements along with quality indicators which are reviewed across the programme of work and on completion. Confidentiality clauses embedded in contracts to ensure that confidentiality

Role	Potential Conflicts of Interest	Responses
	<p>Qualifications) Ltd as an AO/end point assessment organisation work directly with another AO/end point assessment organisation in a qualification/assessment development or advisory role where they could use their knowledge of Future (Awards and Qualifications) Ltd activities adversely.</p>	<p>of any work related to the development, delivery and award of Future (Awards and Qualifications) Ltd qualifications/assessments is maintained. Legal review of contracts undertaken where necessary.</p> <p>Consultants are required to declare to Future (Awards and Qualifications) Ltd if they have a current or recent financial or professional interest in another AO/end point assessment organisation. The extent of the conflict will be evaluated and any relevant action taken to mitigate or remove the conflict which may include not engaging with the consultant.</p> <p>Should a conflict of interest be discovered which was not declared the contract with the consultant can be terminated.</p>
<p>Markers and examiners</p>	<p>Markers and examiners who have a personal interest in the result of an Assessment.</p>	<p>Confidentiality clauses are included in all contracts to ensure that confidentiality of any work related to the development, delivery and award of Future (Awards and Qualifications) Ltd qualifications is maintained. Legal review of contracts undertaken where necessary.</p> <p>Markers and examiners are not permitted to mark the work from any centre or training provider with whom they have had a working or financial relationship during the previous three years.</p> <p>Markers and examiners are not permitted to mark the work of any learner who is a relative or friend.</p> <p>Markers and examiners are required to declare to Future (Awards and Qualifications) Ltd if they such interests in a centre/learner which has been allocated to them for marking purposes. The extent of the conflict will be evaluated and action taken which includes reallocating a centres/training providers/friend/relative's assessments to an alternative marker/examiner.</p> <p>Should a conflict of interest be discovered which was not declared the contract of employment with the marker/examiner can be terminated and the decisions undertaken by the marker/examiner will be reviewed.</p>
<p>Centres and training providers</p>	<p>Future (Awards and Qualifications) Ltd enters into an Introducer Agreement with one of its centres to bring new opportunities to Future (Awards and Qualifications) Ltd. Pressure may be applied to the AO to reduce the robustness of quality assurance processes.</p>	<p>Detailed, formal agreements are in place to ensure that there is separation between the centre's and training providers work and that of the introducers. Future (Awards and Qualifications) Ltd makes centre approval and training provider contractual decisions based on the evidence provided as part of its approval process and on all assessment and certification claims thereafter (if approved).</p> <p>This ensures that only centres and training providers that have the capacity, capability and resources to deliver Future (Awards and Qualifications) Ltd qualifications and assessments are</p>

Role	Potential Conflicts of Interest	Responses
		<p>approved. Centre approval/contract arrangements and quality assurance processes are the same for all centres and training providers. These actions ensure that learner's interests are protected and an adverse effect is not created.</p>
<p>Centre/training provider assessors and internal quality assurer (IQA)</p>	<p>Internal assessment or quality assurance carried out at a centre/training provider is done by a person who is related to or a close friend of the learner or assessor.</p>	<p>As part of the centre approval process, all Future (Awards and Qualifications) Ltd Centres are required to have in place a conflict of interest policy which is subject to review as part of the quality assurance arrangements in place for monitoring of Centres.</p> <p>A Centre or training provider must have systems and checks in place to ensure that an assessment or IQA activity is not undertaken by anyone who has a personal interest in the result of the assessment. Any potential or actual conflicts identified by the centre or by a member of Future (Awards and Qualifications) Ltd external quality assurance team, must be reported.</p> <p>The extent of the conflict will be evaluated and action taken which may include reallocating the learners work to another assessor/IQA.</p> <p>If it is not possible to avoid a situation where assessment or IQA is undertaken by a person who has an interest in the result, for example where very specialist knowledge is required, Future (Awards and Qualifications) Ltd will assist in the facilitation of arrangements. The assessment would be scrutinised by another person to ensure that all systems have been correctly followed.</p> <p>Should a conflict of interest be discovered which was not declared the contract of employment with the marker/examiner can be terminated and the decisions undertaken by the marker/examiner will be reviewed.</p>



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Annual disclosure of potential and actual conflicts of interest

Explanation

In line with the Future (Awards and Qualifications) Ltd' Conflict of Interest policy we require that employees and others acting on Future (Awards and Qualifications) Ltd' behalf disclose any potential or actual conflicts of interest that could adversely influence their judgment, objectivity or loyalty to Future (Awards and Qualifications) Ltd in conducting business activities and assignments.

Please indicate below any legitimate financial, business, charitable and other activities outside your Future (Awards and Qualifications) Ltd role that you have that could result in a conflict of interest. This will include any employment you have at Future (Awards and Qualifications) Ltd centres.

Declaration

Name:

Post:

List of any activities or relationships that could be a conflict of interest with your work with Future (Awards and Qualifications) Ltd (see the Conflict of Interest Policy and your contractual arrangements for details of possible scenarios):

Nature of Conflict i.e. centre, individual, appointment, employment	Details of Conflict

I declare that the above information is a full and complete disclosure and that I will report any new activities that could be a potential conflict of interest as and when they occur.

Signed:

Date:

FutureAssessTM

INSPIRING LEARNING AND SKILLS

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