

Conflicts of Interest Policy Statement

Introduction

This document outlines The Changist's approach to identifying and monitoring all actual or potential conflicts of interest that may adversely affect the integrity of its business and associated partners.

This policy reflects requirements contained within clause A4 of the Conditions of Recognition (CoR) (Ofqual, CCEA, Qualifications Wales) and supports compliance with SFJ Awards Conflict of Interest Policy.

This policy operates at an organisational and individual level, and includes any organisation and individual contracted to support the design, delivery and award of qualification approved by SFJ Awards.

Review arrangements

The Changist Head of Centre will review this document annually as part of its self-evaluation arrangements. However, a review may be commissioned earlier should an issue arise in relation to an actual or potential conflict of interest and/or in response to customer, learner or regulatory feedback.

Definition of a conflict of interest

For the purposes of this policy, we have adopted the definition used by the regulatory authorities in relation to conflicts of interest. A conflict of interest exists in relation to any activity undertaken by The Changist, their staff, or any individual or organisation undertaking activity in relation to all SFJ Awards Qualifications.

- an individual who is connected to the development and delivery of qualifications has interests in any other activities which have the potential to lead that person to act contrary to his or her interests in that development or delivery and impact on our compliance with the requirements of the awarding body
- an individual and/or organisation colludes with other providers, employers or other organisations in the delivery of a qualification for money or any other reciprocal agreement or gain, or an informed and reasonable observer would conclude that any of these situations was the case
- a member of staff at The Changist connected to the delivery or assessment of SFJ qualifications has interests in any other activities which have the potential to lead that person to act contrary to their interests in that delivery or assessment
- an assessor should not be permitted to be involved in quality assurance activity for the same individual/group of apprentices where they have involvement in the delivery or assessment of on-programme learning
- Where an individual/organisation is unsure as to whether an activity may constitute a conflict of interest, they should approach the Head of Centre or SFJ Awards for further advice.

Overview

Any individual or organisation undertaking any activity for or on behalf of The Changist in relation to the design, development and delivery qualifications is required to keep all associated policies, processes and procedures under review, and fully in line with the expectations and requirements of any agreement (terms and conditions), including the management of risks associated with conflicts of interest.

Individual The Changist team members and all other individuals and/or organisations who have involvement in SFJ Awards Assessment as above, must sign a conflict of interest declaration (Appendix A) and register this with the Head of Centre. Where, after signing said declaration, they undertake activity not declared that may constitute a conflict of interest, they must refer immediately to the Head of Centre prior to undertaking any activity they believe may cause a conflict of interest.

This approach aims to remove, mitigate or manage all identified conflicts of interest, thereby protecting the integrity of the Assessment required from all stakeholders invested in the outcomes and achievement of all SFJ Awards registered apprentices.

Conflict of interest principles

In implementing our approach to identifying and managing actual/potential conflicts of interest, individuals (managers, staff and others involved in the development and delivery of Assessment) are required to abide by the following principles:

- commit to identifying and managing all actual/potential conflicts of interest that may affect The Changist and, in doing so, raise possible conflicts of interest with the Head of Centre or SFJ Awards.
- be proactive in the identification and management of conflicts of interest that may affect, for example, The Changist's effectiveness, level of regulatory compliance and/or reputation
- be open about the nature of any potential/actual conflicts of interest and not try to hide or present them in a better light. Managing conflicts of interest is about preventing issues from occurring that may impact on our operational effectiveness and/or regulatory compliance
- strive to identify and deal with conflicts of interest as soon as they are identified
- ensure that controls for managing any potential conflicts of interest are proportionate to the risks associated with the identified conflict(s)
- where appropriate, where an individual/organisation acts in dual capacity (e.g. both as training provider and End-point Assessor) ensure robust measures are in place that demonstrate separation of business activities to enable effective management of conflict of interest

Dealing with conflicts of interests and/or breaches to the procedures outlined in this policy

Where an individual and/or organisation believes there has been a breach of this policy, or if unforeseen conflicts of interest emerge, the Head of Centre must be informed immediately so they may conduct an investigation and review of the associated procedures. Outcomes of such reviews will be reported to the SFJ.

If the breach is also classified as an adverse effect, the Head of Centre will promptly inform SFJ Awards in accordance with the procedure for dealing with adverse effects. In doing so, they will also inform the mof the reasonable steps that have been taken, or intend to be taken, to prevent, correct or mitigate the adverse effect, including details of any reviews that The Changist agrees to carry out.

For information, the regulatory definition of an adverse effect is:

An act, omission, event, incident, or circumstance has an adverse effect if it –

A. gives rise to prejudice to learners or potential learners or

B. adversely affects –

i. the ability of the training provider to undertake the development, delivery or award of SFJ Awards qualifications in accordance with its Conditions of Recognition,

ii. the qualifications which SFJ Awards makes available or proposes to make available, or

iii. public confidence in the standards implemented by The Changist

Contact

If you have any queries about the contents of the policy, please contact the The Head of Centre via email at carol@thechangist.co.uk

Signed C M Pearce

Dated 28th July 2023

Review date July 30th 2024

Appendix A: conflict of interest declaration form

Each member of our staff involved in the development and delivery of qualifications must complete the following template to help ensure The Changist actively identifies and manages any potential conflicts of interest.

The Changist will consider each instance and the controls that should be put in place to mitigate/remove any conflict.

Name	Title/role
Examples of activities that may lead to a possible conflict of interest occurring (list not exhaustive) are where an individual: • has a personal/familial connection to an apprentice • has been involved in the training of an apprentice or employed with an organisation responsible for training an apprentice • holds a financial interest in any organisation which might gain financially from an apprentice's successful completion	
Section 1 List any activities which may conflict with any activity you undertake for or on behalf of The Changist. (If you have no potential conflicts to be considered, skip to Section 2). - - - -	
Section 2 I DECLARE that I do not undertake any activity or have any relationships with any other individual or organisation, now or in the past twelve months, that may constitute a conflict of interest with any assessment, training or quality assurance activity I undertake for and on behalf of The Changist.	
Signed	Date