

ITC First

**P13
Conflicts of Interest Policy 2018 [1]**

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ITC First

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Website Access

For all policy statements and downloadable documents,

Upload to:

RITS	QR	SR	ITC Public	ITC Server
✓	✓	✓		✓

Conflicts of Interest [COI] Policy & Compliance

1. Overview

- 1.1 A Conflict of Interest [COI] for Awarding Organisations is defined by Ofqual and Qualifications Wales (A4.1), and this policy document will apply that definition when referring to COI. This definition will also be used for SQA Accreditation purposes.
- 1.2 A conflict of interest exists in relation to an awarding organisation/body where –
 - a) 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 in accordance with its Conditions of Recognition.
 - b) A person who is connected to the development, delivery or award of qualifications 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,
 - c) Or an informed and reasonable observer would conclude that either of these situations was the case.
- 1.3 This policy identifies potential and actual COI by reviewing procedural timelines and indicating who does what and when.
- 1.4 This policy describes how potential and actual COI are managed and / or mitigated so that adverse effects are eliminated or mitigated.
- 1.5 This policy describes the Learner assessment procedure for ITC qualifications and how COI are mitigated.
- 1.6 This policy describes how COI are monitored.
- 1.7 This policy describes how ITC complies with regulatory conditions regarding COI.

2. Identifying Conflict of Interest

2.1 Centre approval process, evidence documents and responsible person. The stages in the process are identified, where there is the potential for conflict of interest to arise.

Stage	Procedure	Doc	By
(a)	Centre initial approval by review of online application documents	Digital record	QA & CV
(b)	Approved Centre business	C9	QA & CV
(c)	Centre initial External Quality Assurance reporting	EQA6	EQA
(d)	Unannounced visits to Centres	EQA6	EQA
(e)	Action Plan review arising from Centre EQA reports	Website	CV
(f)	Annual review of each Centres activity + contact dialogue	TBA	CV & EQA
(g)	Annual review of Centre EQA reports	Report	CV
(h)	Assigning risk rating to Centre	Website	CV
(i)	Review of CV Report	Report	OM & QA

2.2 Centre external quality assurance procedures

Stage	Procedure	Doc	By
(a)	Selection of EQA	JD8, EV1	CV, OM
(b)	Training of EQA	Workshop	CV
(c)	Unannounced visits	EQA6	EQA
(d)	External Quality Assurance Report	EQA6	EQA
(e)	Review of EQA activity and reports	EQA8, 9	CV
(f)	Annual review of EQA reporting	Report	CV
(g)	Assign risk rating to EQA	Website	CV

2.3 Assessment of learners

Stage	Procedure	Doc	By
(a)	Internal assessment of practical performance	A1, A4	IA
(b)	Internal assessment of knowledge	MCQ	IA
(c)	Internal verification of Assessor decisions	PR6 (or similar document)	Peer IA
(d)	Unannounced visits by EQA	EQA6	EQA
(e)	Sampling of written evidence	MCQ, portfolio	ITC
(f)	Scrutiny of all candidate evidence	IA docs	AM, AMA
(g)	Annual review of assessment evidence data	Report	OM

3 Managing or mitigating adverse effects

- 3.1 Each identified stage in Section 2, above is reviewed by ITC Senior Officers. This review function been added to the Policy Committee terms of reference [Document CG1, Section 8.2e)] and the job descriptions of the Chief Executive Officer [JD15, Section 2.2 f) v.] and Awards Manager [Doc JD1, Section 2.2 h) v].
- 3.2 The Senior Officers of the Policy Committee are ultimately responsible for monitoring the effectiveness of ITC documented procedures including COI mitigating measures. Conflict of Interest is considered as part of regular risk review during Policy Committee meetings. Where COI is identified the Policy Committee will take appropriate action to mitigate or remove the conflict. Identified COI will be reported under risk review, with any subsequent action (and monitoring) recorded in PCAP (Policy Committee Action Plan).

4. Learner Assessment & COI

- 4.1 ITC is required to manage learner assessment and COI, namely:
- a) ITC has to confirm that it takes all reasonable steps to avoid any part of the assessment of a Learner (including by way of Moderation) being undertaken by any person who has a personal interest in the result of the assessment.

- b) Where, having taken all such reasonable steps, an assessment by such a person cannot be avoided ITC will ensure that arrangements (i.e. mitigation) are made for the relevant part of the assessment to be subject to scrutiny by another person.

4.2 COI is recorded and monitored using the document RE3 (tab in PCAP).

4.3 ITC Centres are required to sign an undertaking [C9] confirming 4.1 above

5. Compliance with Regulatory Conditions

5.1 ITC will comply with the regulatory conditions by

- a) This policy being updated as required by the Policy Committee and at least annually
- b) Associated evidence regarding COI, is to be reviewed annually by the Policy Committee, the Spring of each calendar year.
- c) A written summary of COI is provided for the Policy Committee to review, by the CEO [JD8 2.2 f) v]
- d) RE3 and Operations Manager's report will form part of Policy Committee action plan
- e) Removed – Annual Report not produced

5.2 ITC agrees to comply with the following regulatory statement from Ofqual:

“A4.8 When requested to do so by Ofqual in writing, an awarding organisation must promptly submit to Ofqual its conflict of interest policy, and must subsequently ensure that the policy complies with any requirements which Ofqual has communicated to it in writing.”

And from the Welsh Government:

“A4.8 When requested to do so by the Welsh Government in writing, an awarding organisation must promptly submit to the Welsh Government its conflict of interest policy, and must subsequently ensure that the policy complies with any requirements which the Welsh Government has communicated to it in writing”

5.3 ITC agrees to comply with the following extract from the SQA Accreditation Regulatory Principles (2011) – Principle 3; guidance:

“... employ robust processes This would include the identification, and where possible, mitigation of conflicts of interest. Where conflicts are identified the awarding body ensures the protection of all stakeholders.”

6. Strategic COI

6.1 The Policy Committee recognises that COI potentially exists at the strategic or commercial and business level. The Policy Committee is to review this level of COI when reviewing the OM report and PC Action Plan.