

**RECAO**

# Policy Document

## Conflict of Interest Policy

## RECAO Conflict of Interest Policy

### Regulatory Requirements -General Conditions of Recognition: Condition A4

#### Conditions for organisations on the register of end point assessment organisations- Conflict and Collusion Criteria 33-43

##### Introduction

As a regulated awarding organisation RECAO is required by the General Conditions of Recognition to have in place a Conflict of Interest policy that enables us to identify, manage and mitigate conflict of interest. All relevant 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 RECAO's role as an awarding organisation. 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 RECAO's qualifications, tests and assessments, and supporting resources and services.

The individuals falling within the scope of this policy include directors, employees, contractors, home workers, agency workers and any associate staff, including assessment associates, verifiers/examiners and freelance staff

##### 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 relating to RECAO's activity, for example:

- Where the training delivery function and the assessing and awarding function rest within one umbrella organisation.
- 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.

## The essential information you need to work with REC

- Where someone works for or carries out work on RECAO's behalf, but may have personal interests – paid or unpaid – in another business which either uses RECAOs products or services, or produces similar products.
- Where someone works for or carries out work on RECAO's behalf, who has friends or relatives taking RECAOs assessments or examinations.
- Where end point assessors/examiners/internal verifiers work with a business that is in direct competition with RECAO
- Where End point assessors hold positions of marking/delivering/assessing at other organisations or within RECAO

### **Principles**

As an Awarding Organisation RECAO will:

- Ensure that when one part of RECAO creates and follows a procedure, it does not conflict with RECAO's regulatory responsibility as an awarding organisation.
- Review our processes annually to ensure that all conflicts of interest or potential conflicts of interest are managed and resolved.
- Ensure that the contractual arrangements with our assessment associates clearly set out any obligations on them to manage conflicts of interest arising from other activities that they undertake.
- Ensure that anyone who has access to confidential assessment material for a qualification is not permitted to deliver or be present at training events on that qualification.
- Ensure that all members of staff declare any interest for friends or family sitting upcoming RECAO examinations.

### **Responsibilities**

#### **The Responsible Officer**

The ultimate responsibility for the Conflict of Interest Policy, dissemination of the policy and management of potential and actual conflicts of interest rests with the Responsible Officer

#### **Management**

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

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

Divisional and departmental management meetings are required to give appropriate attention to potential or actual conflicts of interest.

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

Any potential or actual conflict of interest must be documented and the issues must be resolved or, for issues that cannot be resolved at this level, report the issue to the Responsible Officer .All records are required to be available for audit purposes.

## **All staff**

Individuals within RECAO have responsibility for ensuring that they are familiar with the Conflict of Interest Policy, any guidelines and complete any 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 Responsible Officer. 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 RECAO 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. A staff member must not take on any such activities that could be deemed to compete or conflict with RECAO's activities.

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

## **Responsible officer: monitoring and escalation**

The Responsible Officer is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the business and, when necessary, to the regulatory authorities.

## **Advice and guidance**

Any required guidance or interpretation on potential conflicts of interest should be sought from the office of the Responsible Officer

## **Regulatory references**

UK regulators require all awarding organisations to establish and maintain their compliance with regulatory conditions and criteria. As part of this process, policies that relate to RECAO's status as an awarding organisation will reference any particular conditions and criteria that they address.

### Conflict of Interest Declaration

#### Individuals contracted by RECAO to undertake activities

*This declaration must be signed and returned to RECAO even if there is nothing to disclose.*

Please list any organisations in which you have had a current or recent relationship. It is also necessary to know of other organisations in which you may have a vested interest.

- Interest / involvement in RECAO/ providers (please list any RECAO customers below, with centre number and state your level of engagement)

- Interest / involvement in other Awarding Organisations (please note below and state your level of engagement)

- Interest / involvement in other Consultancy related to vocational education and training and state your level of engagement

Please tick each box(s) which reflects the role(s) you are contracted for:

- Qualification Consultant
- Exam Writing team
- Chief Examiner
- Examiner
- Centre Manager
- AO staff

I agree to inform RECAO of any conflicts of interest that may arise

Name: \_\_\_\_\_  
(Please print in block capitals)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Address: \_\_\_\_\_

Postcode: \_\_\_\_\_