conflict of interest Policy

AC002

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## Purpose

* 1. The purpose of this policy is to provide guidance to relevant individuals on handling possible conflicts of interest that may arise at Chequers Academy during assessing and moderation of accredited units and qualifications.
  2. This policy applies to all staff and other individuals whenever they interact or potentially interact with any of the organisation’s operations.
  3. This policy:
     1. Defines what is meant by conflict of interest sets out the roles and responsibilities for managing conflict of interest
     2. Illustrations of potential conflict of interest situations.

## Scope

* 1. It is the policy of Chequers Academy Tutors, Assessors and Internal Verifiers acting on behalf of the business must be free from conflicts of interest that could adversely affect their judgment or objectivity to the organisation in conducting business activities and assignments.
  2. Chequers Academy recognises that tutors and assessors may take part in legitimate financial, business, charitable and other activities outside of their recognised roles at the business, but any potential conflict of interest raised by those activities must be acknowledged, disclosed, and in relevant cases properly managed.
  3. It is the responsibility of each individual to recognise situations in which they have a conflict of interest or might reasonably be seen by others to have a conflict; to disclose this conflict and to take such further steps as may be appropriate and set out in more detail under the procedure below.

## Definition of Conflict of Interest

* 1. A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. Conflicts of interest can arise in a variety of circumstances in relation to awarding organisation activity, for example:
     1. where the training delivery function and the awarding function rest within one organisation and the functions are not strictly delineated.
     2. when an individual has a position of authority in one organisation which conflicts with his or her interests in another organisation.
     3. when an individual has personal interests that conflict with their/his/her professional position.
  2. A conflict of interest may generally be defined as:
     1. A conflict between the official responsibilities of a tutor, assessor, and internal verifier and any other interests the particular individual may have and as such could compromise or appear to  compromise their decisions.
     2. A person who is connected to the development, delivery or award of qualifications by the 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 organisations conditions of recognition.
  3. An informed and reasonable observer would conclude that either of the above situations was the case
  4. A conflict of interest may include:
     1. Tutors and assessors working with a business that is in direct competition to Chequers Academy.
     2. Tutors and assessors participating in the appointment, supervision evaluation or assessment of a person with whom the person, has close or familial ties.
     3. Tutors and assessors having a close or familial relationship with the registered learner, or learners’ family whilst being involved in decisions about the outcome of their accreditation or qualification or where the person whose remuneration is in part determined by the outcome of the assessment.

## Roles and Responsibilities

* 1. All relevant staff undertaking assessment (‘assessors’), moderation (‘moderators’ or ‘verifiers’) and other individuals have a responsibility to be aware of the potential for a conflict of interest.
  2. Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact on the standards of the Chequers Academy and its awarding and inspecting bodies as well as public confidence.
  3. It is the duty of all tutors and assessors to disclose any actual or potential conflict of interest and advise the Medical Education Director in writing. The information submitted is then evaluated to identify if any further action is required and a written record of the outcome of the evaluation is kept and a copy will be provided to the concerned individuals.
  4. If the individual concerned has any changes to their declared circumstances, they must inform their line manager immediately in writing, so that the conflict of interest can be evaluated, and the register updated.

## Monitoring

* 1. We will maintain and review the records of all learners in order to monitor the progress of this policy.
  2. Monitoring may involve:
     1. the collection and classification of information regarding the race in terms of ethnic/national origin and sex of all learners.
     2. the examination by ethnic/national origin and sex of the distribution and success rate of learners; and
     3. recording enrolment and training records of all learners, the decisions reached and the reason for those decisions.
  3. The results of any monitoring procedure will be reviewed at regular intervals to assess the effectiveness of the implementation of this policy. Consideration will be given, if necessary, to adjusting this policy to afford greater equality of opportunities to all applicants and learners.

## Policy Review

This policy will be reviewed on a three-year cycle. However, where legislation is updated, the policy will be reviewed accordingly.

## Document Control

### Confidentiality Notice

* + 1. This document and the information contained therein is the property of Chequers Health Group Ltd.
    2. This document contains information that is privileged, confidential or otherwise protected from disclosure.
    3. It must not be used by, or its contents reproduced or otherwise copied or disclosed without the prior consent in writing from Chequers Health Group.

### Document Revision and Approval History

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Version** | **Date** | **Created By / Updated By** | **Approved by** | **Comments** |
| 1 | 01/09/2024 | J. MacGregor |  | New policy release |

As with all policies, protocols and procedures, this policy is a working document and may be changed from time to time. Any changes will be communicated accordingly within the organisation

## Policy Screening

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Policy Title: Conflict of Interest | | | | | | | |
| Policy Content:  For each of the following check whether the policy under consideration is sensitive to people of a different age, ethnicity, gender, disability, religion or belief, and sexual orientation?  The checklist below will help you to identify any strengths and weaknesses of the policy and to check whether it is compliant with equality legislation. | | | | | | | |
| 1. Check for DIRECT discrimination against any minority group of LEARNERS: | | | | | | | |
| Question: Does the policy contain any statements which may disadvantage people from the following groups? | | Response | | Action required | | Resource implication | |
| Yes | No | Yes | No | Yes | No |
| 1.0 | Age? | No | | No | | No | |
| 1.1 | Gender (Male, Female and Transsexual)? | No | | No | | No | |
| 1.2 | Learning Difficulties / Disability or Cognitive Impairment? | No | | No | | No | |
| 1.3 | Mental Health Need? | No | | No | | No | |
| 1.4 | Sensory Impairment? | No | | No | | No | |
| 1.5 | Physical Disability? | No | | No | | No | |
| 1.6 | Race or Ethnicity? | No | | No | | No | |
| 1.7 | Religious Belief? | No | | No | | No | |
| 1.8 | Sexual Orientation? | No | | No | | No | |
| TOTAL NUMBER OF ITEMS ANSWERED ‘YES’ INDICATING DIRECT DISCRIMINATION = 0 | | | | | | | |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 2. Check for INDIRECT discrimination against any minority group of LEARNERS: | | | | | | | |
| Question: Does the policy contain any conditions or requirements which are applied equally to everyone, but disadvantage particular people because they cannot comply due to: | | Response | | Action required | | Resource implication | |
| Yes | No | Yes | No | Yes | No |
| 3.0 | Age? | No | | No | | No | |
| 3.1 | Gender (Male, Female and Transsexual)? | No | | No | | No | |
| 3.2 | Learning Difficulties / Disability or Cognitive Impairment? | No | | No | | No | |
| 3.3 | Mental Health Need? | No | | No | | No | |
| 3.4 | Sensory Impairment? | No | | No | | No | |
| 3.5 | Physical Disability? | No | | No | | No | |
| 3.6 | Race or Ethnicity? | No | | No | | No | |
| 3.7 | Religious, Spiritual belief (including other belief)? | No | | No | | No | |
| 3.8 | Sexual Orientation? | No | | No | | No | |
| TOTAL NUMBER OF ITEMS ANSWERED ‘YES’ INDICATING DIRECT DISCRIMINATION = 0 | | | | | | | |