

D11 CONFLICTS OF INTEREST POLICY

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INTRODUCTION

This policy outlines the principles and procedures for managing conflicts of interest within Accipio.

SCOPE

Tutors and assessors acting on behalf of Accipio must be free from conflicts of interest that could adversely affect their judgement or objectivity to the organisation in conducting business activities and assignments.

Accipio recognises that tutors and assessors may take part in legitimate financial, business, charitable and other activities outside of their Accipio roles, but any potential conflict of interest raised by those activities must be acknowledged, disclosed, and in relevant cases properly managed.

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

A conflict of interest may generally be defined as 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.

Condition A4 in the Ofqual General Conditions of Recognition 2011 states that a conflict of interest exists in relation to an Awarding Organisation where:

- The organisations 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
- 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 organisations conditions of recognition
- An informed and reasonable observer would conclude that either of the above situations was the case

EXAMPLES OF CONFLICTS OF INTERESTS

It is not possible to provide a definitive list of examples of conflicts of interests, but the following are examples of situations that could lead to actual or perceived conflicts of interest:

- Tutors and assessors working with a business outside of Accipio that is in direct competition with them

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- Tutors and assessors participating in the appointment, promotion, supervision or evaluation of a person with whom the person, has close or familial ties
- Tutors and assessors having a close or familial relationship with an ILM registered learner, or learners' family whilst being involved in decisions about the outcome of their qualification
- Tutors and assessors using non-public ILM information or ILM learner data for personal gain or advantage
- Tutors and assessors involved in the Accipio approval processes, who own business consultancies offering ILM qualifications or programmes.

The existence of such interests as those outlined above, does not necessarily imply conflict, but is likely to give an appearance of conflict and as such should be declared.

PROCESS

It is the duty of all tutors and assessors to disclose any actual or potential conflict of interest, and the process for doing this is documented below:

- All tutors and assessors are issued with a conflict of interest form to complete on commencement with the organisation and it is a requirement of their contract that this is completed and updated on an annual basis.
- The information held on the conflict of interest form is then transferred to a register of interests document which is maintained by a designated person at Accipio.
- 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
- The form is to be completed even when the individual has no conflict of interest to declare.
- 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.

ACTION

Most situations require no further action than the completion of the conflict of interest form. In some instances, however, the information declared on the form will require some follow up action, in order for the conflict of interest to be managed appropriately.

The approach agreed between the line manager and the tutor and assessor, will be documented and held with the conflict of interest forms.

Examples of actions that could be taken

- Individual not taking part in discussions or decisions of certain matters
- Referring certain matters for decision to others with no vested interest
- Agreeing not to be involved in a particular project or with a particular centre
- Declaring an interest when it is appropriate to do so
- Referring the matter to ILMRegulation@i-l-m.com for advice and guidance.



APPENDIX 1: CONFLICT OF INTEREST DISCLOSURE FORM

| | |
|-------------------------|--|
| Name | |
| Position within Accipio | |

| YES | NO | PLEASE ANSWER THE FOLLOWING QUESTIONS: |
|-----|----|--|
| | | Is there any relationship, either internal or external, which you feel could cause potential or apparent conflict of interest with your Accipio activities? If yes, please provide further details of the relationship below |
| | | Q1. Are you working with a business outside of Accipio that is in direct competition? |
| | | Q2. Are you participating in the appointment, promotion, supervision or evaluation of a person with whom the person, has close or familial ties |
| | | Q3. Do you have a close or familial relationship with an ILM registered learner, or learners' family whilst being involved in decisions about the outcome of their qualification? |
| | | Q4. Are you using non-public ILM information or ILM learner data for personal gain or advantage |
| | | Q5. Are you aware of any other circumstances that could constitute a conflict of interest with your position within Accipio? |

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I acknowledge that I have read and understood the Accipio policy on Conflict of Interest. I confirm that this form has been completed to the best of my knowledge and that the information contained on this form is true and correct. I understand that if the information is later found to be false I may be subject to disciplinary proceedings.

Signed

Date

| | | | |
|---------------------------------|-----|--|------|
| Reviewed by Accipio Director on | | | |
| Approved by Accipio Director | YES | | NO |
| Signed by Accipio Director | | | Date |

On completion this form must be returned to ask@accipio.com via email.