

# CONFLICTS OF INTEREST (COI) POLICY

**Policy Review Date:** 1 April 2026

**Next Review Date:** 1 April 2027

## 1. Purpose

The purpose of this policy is to ensure that Footprint School of Business (FSOB) identifies, manages, and mitigates any actual, potential, or perceived conflicts of interest that may compromise the integrity, objectivity, and fairness of assessment, internal quality assurance, and centre operations.

## 2. Scope

This policy applies to:

- All staff (permanent, temporary, and associate)
- Assessors, Internal Quality Assurers (IQAs), and administrative staff
- Senior management and governance personnel
- Learners, where applicable (e.g. personal relationships with staff)
- External contractors or partners involved in delivery or assessment

## 3. Definition of Conflict of Interest

A conflict of interest arises where an individual's personal, professional, or financial interests could:

- Influence their judgement or decision-making
- Compromise the integrity of assessment or quality assurance
- Create an unfair advantage or disadvantage for a learner

Conflicts may be:

- **Actual** – a real conflict exists
- **Potential** – a conflict could arise in future
- **Perceived** – a conflict appears to exist, even if not actual

#### 4. Examples of Conflicts of Interest

Examples include, but are not limited to:

- Assessing or verifying work of a **family member, friend, or close associate**
- Financial or personal interest in a learner's success
- Staff delivering and internally verifying the same learner's work without appropriate controls
- Recruitment decisions influenced by personal relationships
- External employment that conflicts with centre duties
- Involvement in malpractice investigations where impartiality cannot be assured

#### 5. Policy Principles

FSOB is committed to:

- **Transparency:** All conflicts are declared and recorded
- **Integrity:** Decisions are made objectively and fairly
- **Accountability:** Staff take responsibility for declaring conflicts
- **Compliance:** Processes align with NCFE requirements
- **Risk Management:** Conflicts are actively managed and mitigated

#### 6. Identification and Declaration of COI

##### 6.1 Declaration Requirements

All staff are required to:

- Declare any actual, potential, or perceived conflict of interest
- Complete a Conflict of Interest Declaration Form:
  - At induction
  - Annually
  - As soon as a conflict arises

##### 6.2 Learner Declarations

Learners may also be required to declare relationships or circumstances that could present a conflict.

## **7. Recording of Conflicts**

All declared conflicts are recorded in a Conflict of Interest Register, which includes:

- Name of individual
- Nature of conflict
- Date declared
- Risk level
- Mitigation actions
- Review date

The register is maintained by the Quality Lead and is available for EQA review.

## **8. Management and Mitigation of COI**

Where a conflict is identified, FSOB will implement appropriate controls, including:

- Reallocation of assessment or IQA responsibilities
- Independent verification or second marking
- Increased sampling by IQA
- Removal of individual from decision-making processes
- Clear separation of roles and responsibilities

All actions are documented and monitored.

## **9. Notification to Awarding Organisation**

Where a conflict of interest is deemed significant or may impact:

- Assessment decisions
- Quality assurance processes
- Integrity of qualifications

FSOB will:

- Notify Awarding Organisation promptly
- Provide full details of the conflict
- Share mitigation actions taken

This ensures transparency and compliance with awarding body requirements.

## **10. Internal Quality Assurance (IQA) Oversight**

The IQA process ensures that:

- Conflicts of interest are identified and appropriately managed
- Assessment decisions remain valid, reliable, and fair
- Additional sampling is conducted where conflicts are present
- Evidence of mitigation is documented

IQA reports will include reference to any identified conflicts and actions taken.

## **11. Evidence for EQA / NCFE Review**

Where NCFE has been notified of a conflict of interest, FSOB will provide evidence including:

- Completed Conflict of Interest Declaration Forms
- Extract from the COI Register
- Documented risk assessment and mitigation actions
- IQA sampling plans showing additional oversight
- Records of reassigned roles or decisions
- Communication with NCFE

This ensures that internal processes have been followed in line with policy.

## **12. Roles and Responsibilities**

**All Staff:**

- Declare conflicts promptly
- Act with integrity and professionalism

**Assessors and IQAs:**

- Ensure impartiality in assessment and verification
- Report any concerns immediately

**Quality Lead / IQA:**

- Maintain COI Register
- Monitor and manage risks
- Ensure compliance with NCFE requirements

**Senior Management:**

- Oversee policy implementation
- Make decisions on high-risk conflicts
- Liaise with awarding organisations

**13. Failure to Declare a Conflict of Interest**

Failure to declare a conflict of interest may:

- Compromise assessment integrity
- Result in disciplinary action
- Lead to regulatory or awarding body sanctions

**14. Monitoring and Review**

The effectiveness of this policy is reviewed through:

- IQA processes and sampling
- EQA feedback and reports
- Internal audits
- Annual policy review

Findings inform improvements in:

- Staff training
- Risk management processes
- Quality assurance systems

## **15. Equality and Fairness**

FSOB ensures that all conflict of interest procedures:

- Promote fairness and equality
- Prevent bias or discrimination
- Protect the interests of all learners

## **16. Record Retention**

All COI records are:

- Stored securely
- Retained in line with data protection requirements
- Made available for audit and EQA review